

April 29, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0002

Title: Disaster Assistance Registration

Form Number(s): FEMA Form 009-0-1 English (Replaces 90-69), Application/Registration for Disaster Assistance; FEMA Form 009-0-2 Spanish (Replaces 90-69A), Solicitud/Registro Para Asistencia De Resastre; FEMA Form 009-0-3 English (Replaces 90-69B), Declaration and Release; FEMA Form 009-0-4 Spanish (Replaces 90-69C), Declaración Y Autorización; FEMA Form 009-0-5 English (Replaces 90-69D), Receipt for Government Property; FEMA Form 009-0-6 Spanish (Replaces 90-69E), Recibo de Propiedad del Gobierno

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.

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 federally declared disaster. Referencing 44 CFR Part 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. Individuals and households that apply for this assistance must provide information detailing their losses and needs.

Referenced 44 CFR Part 206.117 authorizes FEMA to provide direct assistance to applicants who are eligible for housing assistance. In order to receive direct assistance for housing (e.g., mobile home or travel trailer) from FEMA, the applicant is required to acknowledge and accept the conditions for occupying government property. In addition, the applicant is required to 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 date in NEMIS to prepare a Receipt for Government Property.

In addition, FEMA complies with the provision 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 Federal Public benefits is a qualified alien and is eligible to receive such benefits; 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: how the information will be shared, if applicable, and for what programmatic purpose.

FEMA Forms 009-0-1 English and 009-0-2 Spanish are used to determine eligibility and to administer financial assistance under a Presidentially-declared disaster. The determination is for the type of assistance (monetary, housing, other needs including vision correction devices, wheelchairs, etc) and the amount that is appropriate.

FEMA Forms 009-0-3 English and 009-0-4 Spanish are used to determine that the registering person is eligible for assistance and to authorize FEMA to obtain information on the registrant's income, financial or credit status.

FEMA Forms 009-0-5 English and 009-0-6 Spanish are used for the respondents who are provided temporary housing so that they may acknowledge receipt of the housing. The respondent is provided a set of conditions to receive the housing and they agree to abide by these conditions.

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.

For FEMA Form 009-0-1 (English) and 009-0-2 (Spanish), Internet registration for assistance at <http://www.fema.gov/assistance/index.shtm> allows respondents to apply online electronically.

For FEMA Forms 009-0-1 (English) and 009-0-2 (Spanish), the toll free 800 number allows respondents to register for assistance over the phone with a FEMA representative.

FEMA Forms 009-0-1 (English) and 009-0-2 (Spanish) can also be completed on a paper form.

FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish) are completed during the inspection process, the respondent will electronically sign the Declaration and Release form on the laptop computer that the inspector has with them.

FEMA Forms 009-0-5 (English) and 009-0-6 (Spanish) are paper forms that the respondent will complete and sign at the time that they receive the temporary housing.

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 purpose of 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.

There is no impact to small business or other entities; this program is assistance to individuals only.

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.

Without this information collection, FEMA would be unable to meet the mandates of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, which directs FEMA to provide disaster assistance and Other Needs Assistance to those who are eligible as a result of a disaster.

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 not 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 an 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 inviting public comments was published on December 29, 2009, Volume 74 pp 68851. 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 May 5, 2010, Volume 75 pp 24733. 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 consults with the U.S. Treasury Department, the Small Business Administration (SBA) (who make loans to individuals that qualify) and other stakeholders on a regular basis regarding the collection of disaster assistance information. Also, there is a yearly meeting of State disaster response officials, Federal Coordinating Officials and other emergency management officials where issues related to this collection are discussed.

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 reviews customer service performance and provides customer service feedback through the Disaster Assistance Customer Satisfaction Survey, which is conducted for each disaster. The data collection for this survey is approved under OMB No. 1600-0036, 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 data collection.

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

A Privacy Impact Assessment was completed on December 31st, 2008 and a System of Records Notice for the Disaster Recovery Assistance Files system was published on September 24th, 2009.

For FEMA Forms 009-0-1 (English) and 009-0-2 (Spanish), individuals that apply for disaster assistance online via the Internet are presented online the Privacy Act Statement at the beginning of the registration process. Individuals that apply by the 800 tele-registration number are read the Privacy Act Statement before beginning the registration. And Individuals that use the Paper Application can read the statement that is typed on the page.

For FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish), respondents read the Privacy Act Statement on the electronic form.

For FEMA Forms 009-0-5 (English) and 009-0-6 (Spanish), the Privacy Act Statement is typed on the paper form that the respondent completes.

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 is no information of a sensitive nature collected.

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.

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

The number of individuals using the FEMA 1-800 Tele-Registration number for completing FEMA Forms 009-0-1 and 009-0-2 (English and Spanish) is estimated to be 1,151,255. It has been estimated that it takes approximately 18 minutes to complete a registration and the total annual hour burden for the Tele-Registration process is 345,377 hours.

The number of individuals using the Internet for completing FEMA Forms 009-0-1 and 009-0-2 (English and Spanish) is estimated to be 515,487. It has been estimated that it takes approximately 18 minutes for applicants to complete a registration through the Internet and the total annual hour burden for the Internet registration is 154,646 hours.

The number of individuals using FEMA Form 009-0-1 and 009-0-2 paper (English and Spanish) is estimated to be 51,549. It has been estimated that it takes approximately 18 minutes for applicants to complete a paper registration and the total annual hour burden for the paper application is 15,645 hours.

It has been estimated that 1,099,706 individuals will complete FEMA form 009-0-3 and 009-0-4 (English and Spanish). It is estimated that it takes approximately 2 minutes for applicants to review and sign the Declaration and Release and the total annual hour burden is 36,657 hours.

It is estimated that 17,183 individuals will complete the Receipt of Governments Property (English and Spanish). It has been estimated to it takes approximately 10 minutes to review and sign the Receipt of Government Property (English and Spanish) and the total annual hour burden is 2,864 hours.

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.

FEMA Forms 009-0-1 (English) and 009-0-2 (Spanish) can be completed in one of three methods; through a 800 number tele-registration, electronically over the Internet, or by paper form. The below chart lists each of these three processes separately. FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish) are completed electronically at the time of the inspection, and FEMA Forms 009-0-5 (English) and 009-0-6 (Spanish) are paper forms completed when a temporary housing unit is delivered.

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
Individuals or Households	Tele-registration Application for Disaster Assistance / FEMA Forms 009-0-1 and 009-0-2	1,151,255	1	1,151,255	0.3	345,377	\$31.78	\$10,976,081
Individuals or Households	Internet Application for Disaster Assistance / FEMA Forms 009-0-1 and 009-0-2	515,487	1	515,487	0.3	154,646	\$31.78	\$4,914,650
Individuals or Households	Paper Application for Disaster Assistance (English and Spanish) / FEMA Forms 009-0-1 and 009-0-2	51,549	1	51,549	0.3	15,465	\$31.78	\$491,478
Individuals or Households	Declaration and Release (English and Spanish) / FEMA Forms 009-0-3 and 009-0-4	1,099,706	1	1,099,706	.033 (2 minutes)	36,657	\$31.78	\$1,164,959
Individuals or Households	Receipt for Government Property (English and Spanish) / FEMA Form 009-0-5 and 009-0-6	17,183	1	17,183	0.167	2,864	\$31.78	\$91,018
Total		1,718,291		2,835,180		555,009		\$17,638,186

- 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) the wage rate category for All Occupations is estimated to be (\$22.70 x 1.4 =) \$31.78 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents All Occupations is estimated to be \$17,626,714 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.)

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

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.

There is no operation, maintenance, capital or 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.

	currently on OMB Inventory)			OMB Inventory)		
Tele-registration Application for Disaster Assistance				\$6,527,625	\$10,976,081	+\$4,448,456
Internet Application for Disaster Assistance				\$2,922,809	\$4,914,650	+\$1,991,841
Paper Application for Disaster Assistance (English and Spanish) / FEMA Forms 009-0-1and 009-0-2				\$292,289	\$491,478	+\$199,189
Declaration and Release (English and Spanish) / FEMA Forms 009-0-3 and 009-0-4				\$692,817	\$1,164,959	+\$472,142
Receipt for Government Property (English and Spanish) / FEMA Form 009-0-5 and 009-0-6				\$54,130	\$91,018	+\$36,888
Total(s)				\$10,489,670	\$17,638,186	+\$7,148,516

Explain: The changes to the Annual Cost Burden result from the increase in hourly wages within the BLS tables as well as from the application of the 1.4 benefit multiplier to the wage rate.

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

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

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 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 is not statistical methodology involved in this collection.