

August 30, 2011

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0061**

**Title: Federal Assistance to Individuals and Households Programs**

**Form Number(s): FEMA Form 010-0-11 (previously FF 90-153);  
FEMA Form 010-0-12**

### 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 206(a) of the Disaster Mitigation Act of 2000 (DMA 2000), Public Law 106-390, consolidated into one section of the Robert T. Stafford Disaster Relief and Emergency Assistance Act two previously existing programs, the “Temporary Housing Assistance” and the “Individual and Family Grant Programs” into a single program called the “Federal Assistance to Individuals and Households” (IHP). To implement this consolidation, which streamlined the provision of assistance to disaster victims, FEMA published rule 44 CFR Part 206 which included this collection of information under the purview of the Paperwork Reduction Act. This information collection provides: 1) disaster victims the opportunity to request approval of late applications, continued assistance, and appeal program decisions and, 2) States with a better opportunity to be active participants in the

“Other Needs” provision of the IHP through the review of an administrative option agreement and the development of an administrative plan.

**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.**

Individuals requesting approval of late application, request for continued assistance or appealing a program decision would be required to submit such a request in writing via mail or fax to FEMA’s Maryland National Processing and Service Center. A FEMA appeals officer will review the information submitted in accordance with established program criteria and procedures. Individuals wishing to request continued assistance with rent will be required to submit via mail or fax a signed “FEMA Form 010-0-12, Application for Continued Temporary Housing Assistance,” which includes information on income, housing cost and their individual recovery strategy.

States opting to participate in the administration or management of the Other Needs provision of IHP must submit via mail a signed Administrative Option Agreement, which includes a signed standard personal property list for that calendar year, establishing the State’s proposed level of support and participation in the delivery of assistance under Section 408 of the Stafford Act. The FEMA Regional Director or designee and the State will use the agreement for planning and developing program implementation procedures to be used during the next calendar year in the implementation of programs under Section 408 of the Stafford Act.

In order to accomplish the objectives stated above, this collection consists of the five elements as follows:

- i. **Request for Approval of Late Registration.** After the registration period ends, 60 days from date of declaration, FEMA will accept late registrations for an additional 60 days. FEMA will process late registrations for those applicants who provide justification for the delay in their registration. In order for FEMA to effectively review the late registration request, it is necessary that we have the request be in writing explaining the reason(s) for the delay in registering.
- ii. **FEMA Form 010-0-12, Request for Continued Assistance (Application for Continued Temporary Housing Assistance).** After the initial assistance, FEMA may provide continued assistance, based on need. In order for FEMA to effectively evaluate the continuing need, it is necessary that we have the applicant submit documentation on their pre-disaster and current housing costs, pre-disaster and current income and verifiable documentation of income, recovery strategy, current lease/cancelled checks, and mortgage payment information. FEMA determines the appropriateness of assistance and the establishment of

criteria, standards, and procedures for determining eligibility for assistance. The submission of the required information will be mandatory to be considered for continued assistance, for both financial and direct assistance. FEMA has added a form number to this instrument (FEMA Form 010-0-12).

iii. **Appeal of Program Decision.** After the initial eligibility decision is made, FEMA provides the applicant with the opportunity to inquire or appeal any determination of eligibility for assistance made under the Federal Assistance to Individuals and Households Program. In order for FEMA to effectively respond to an applicant's appeal, it is necessary that we have the applicant provide, in writing, what they are appealing, and the reason for the appeal.

iv. **FEMA Form 010-0-11 (previously FEMA Form 90-153), Administrative Option Agreement (for the Other Needs provision of IHP).** The purpose of an Administrative Option Agreement between FEMA and the State is to establish a plan for the delivery of assistance under Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended. In order for FEMA to effectively coordinate program activities with the State, it is necessary that we have the State sign an agreement, which establishes a partnership with FEMA and inscribes the plan for the delivery of disaster assistance. The agreement is used to identify the State's proposed level of support and participation during disaster recovery. FEMA Form 010-0-11 (previously FEMA Form 90-153) was approved for use in this collection in 2008. To ensure FEMA's administrative files are clear and concise, and include the past practice of asking the state to sign the standard personal property line item list as part of the agreement, the State will review and provide signature of the standard personal property list for that calendar year. This validates their acknowledgement of the Standardized Personal Property List prior to each calendar year, along with the acknowledgment that they have the option to request or make changes as deemed necessary.

v. **Development of State Administrative Plan for the Other Needs provision of IHP.** When the State's request for a grant from FEMA to provide financial assistance to individuals and households in the State under the Other Needs provision of IHP has been approved, the State will need to address the level of managerial and resource support necessary to complete the State role. In order for FEMA to effectively account for the program costs and to ensure the equitable and timely delivery of assistance, it is necessary that we have the State provide an administrative plan to address the financial and grants management mandates. FEMA is required to monitor the cost effectiveness of the assistance.

**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.**

In an effort to ease the burden and expedite the review of applicants' request for approval of late application, request for continued assistance or an appeal of a program decision, FEMA will accept all of the above information in person at a local disaster recovery center, via mail, or by fax. The forms that are part of this collection are available electronically. FEMA requires applicants to provide a signature for documents they submit. The Administrative Option Agreement and the State Administrative Plan for the Other Needs provision of IHP, are documents requiring original signatures. Regional and State representatives are also given the opportunity to a training session on the Other Needs Assistance provision of the Individuals and Households Program. For future planning, FEMA Form 010-0-11 and FEMA Form 010-0-012 will eventually be available for public use on [www.fema.gov](http://www.fema.gov) under "Apply for Assistance".

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This information is not collected in any form, and therefore is not duplicated elsewhere.

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

This information collection does not have an impact on small businesses or other small entities.

**6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

If the information collection from an applicant is not conducted it will have a negative impact on the applicant's ability to request: *Approval of a Late Application; Continued Assistance, and Appeal a program decision.* The negative impacts could include the following: (1) Applicants who fail to apply within the fixed time frame will not be able to receive disaster assistance; (2) Applicants who have a continuing disaster need will not be able to receive additional assistance; (3) Applicants who disagree with FEMA program eligibility decisions will have no recourse to have their application reviewed.

If the information collection from a State is not conducted or is reduced (conducted less frequently) it will have a negative impact on FEMA's ability to implement the Other Needs provision of IHP. The information to be collected is used in the decision-making process,

which includes determining staffing levels and allocation of resources. The information to be collected allows FEMA to understand the requirements and capabilities of States, which includes being able to determine level of federal dedication the State will be expecting from FEMA. Failure to collect this information may result in delay or rejection of a State request to administer the Other Needs provision of IHP.

**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.**

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

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

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

**(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

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

**(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

**(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

**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 April 29, 2011, Volume 76 FR 24039. **No comments were received.** See attached copy of the published notice included in this package. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on August 3, 2011, Volume 76 FR 46828. **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 States, local and private entities including, the National Emergency Management Associations (NEMA) Response and Recovery Subcommittee, the International Association of Emergency Managers and the State Governors' Washington representative. FEMA receives feedback on the processes employed to gather the information required as per this collection.

FEMA also consults with individuals who would complete other collection instruments within this collection. A survey conducted under OMB Control No. 1660-0129, Federal Emergency Management Agency Individual Assistance Follow-up Program Effectiveness and Recovery, FEMA Form 007-0-14 (previously FF 90-149) questions all aspects of the process that is utilized in this collection of information and the results are compared against the program and appropriate modifications are implemented.

**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 has had extensive consultations with representatives of a number of States, local and private entities including, the National Emergency Management Associations (NEMA) Response and Recovery Subcommittee, the International Association of Emergency Managers and the State Governors' Washington representative. Based on our consultations, we have determined that this collection will not have negative effect on individuals or States.

Consultations with individuals responding to this collection are accomplished with a survey on program effectiveness that is approved for use under OMB Control No. 1660-

0129, Federal Emergency Management Agency Individual Assistance Follow-up Program Effectiveness and Recovery, FEMA Form 007-0-14 (previously FF 90-149). These surveys are randomly administered to a sample population within each disaster and occur after each disaster.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis (PTA) was completed for this collection and forwarded to the FEMA Privacy Office for review. The PTA is still currently being reviewed. The status of this information remains the same as of August 2011.

**11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

**a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated 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.**

**Request for Approval of Late Registration** – The number of respondents for this collection instrument is 6,389 and the frequency of completing this instrument is once annually. There are guidelines in place that allow for a limited opportunity to file a late application for assistance, and based on historical data, only a limited number of respondents will qualify to file for consideration. FEMA has estimated that

approximately 6,389 respondents will complete the Request for Approval of Late Registration. Each document is estimated to take 0.75 (45 minutes) to complete. The total annual burden is estimated to be 6,389 responses x 0.75 minutes (45 minutes) per response = 4,792 hours.

**FEMA Form 010-0-12, Request for Continued Assistance** – The number of respondents for this collection instrument is 80,000 and the frequency of completing this instrument is four times annually. The need for continued assistance is determined from the information provided on the form and its circumstances beyond the normal scope of FEMA's involvement in disaster recovery would necessitate the need for this assistance. The number of respondents is based on the historical information regarding applications received. The burden hours are expected to increase slightly with the addition of a form; however, portions of the form will be auto populated by the information system, thus reducing the overall burden to the respondents. FEMA has estimated that approximately 80,000 respondents will complete the FEMA Form 010-0-12, Request for Continued Assistance. Each form is estimated to take 1 hour to complete. The total annual burden is estimated to be 320,000 responses x 1 hour per response = 320,000 hours.

**Appeal of Program Decision** – The number of respondents for this collection instrument is 234,591 and the frequency of completing this instrument is once annually. This instrument allows for respondents to appeal a decision of an award resulting from disaster occurrence. The number of respondents for this instrument is based on historical data providing the level of appeal activity estimated to occur in an average year. FEMA has estimated that approximately 234,591 respondents will complete the Appeal of Program Decision document. Each document is estimated to take 0.75 (45 minutes) to complete. The total annual burden is estimated to be 234,591 responses x 0.75 minutes (45 minutes) per response = 175,943 hours.

**FEMA Form 010-0-11 (previously FEMA Form 90-153), Administrative Option Agreement (for the Other Needs provision of IHP)** – The number of respondents for this collection instrument is 56 and the frequency of completing this instrument is once annually. Not all respondents to this collection instrument are required to submit the State Administration Plan. This instrument is completed by each of the States, possessions and Territories on a yearly basis as this information is required for any of the respondents to make a request for post-disaster assistance, and the number of respondents is based on the yearly number of instruments received. FEMA has estimated that approximately 56 respondents will complete the **FEMA Form 010-0-11 (previously FEMA Form 90-153), Administrative Option Agreement (for the Other Needs provision of IHP)** form. Each form is estimated to take 1 hour to complete. The total annual burden is estimated to be 56 responses x 1 hour per response = 56 hours.

**Development of State Administrative Plan for the Other Needs provision of IHP** – The number of respondents for this collection instrument is 6 and the frequency of completing this instrument is once annually. The number of respondents is based on the estimated 6 states that will request to participate in the administration and management of IHP. FEMA has estimated that approximately 6 respondents will complete the



Development of State Administrative Plan for the Other Needs provision of IHP. Each document is estimated to take 2 hours to complete. The total annual burden is estimated to be 6 responses x 2 hours per response = 12 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.**

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	Request for Approval of Late Registration / No Form	6,389	1	6,389	0.75 (45 mins.)	4,792	\$31.30	\$149,989.60
Individuals or Households	Request for Continued Assistance / FEMA Form 010-0-12	80,000	4	320,000	1	320,000	\$31.30	\$10,016,000.00
Individuals or Households	Appeal of Program Decision / No Form	234,591	1	234,591	0.75 (45 mins.)	175,943	\$31.30	\$5,507,015.90
State, Local or Tribal Government	Administrative Option Agreement (for the other needs provision of IHP) / FEMA Form 010-0-11 (previously FF 90-153)	56	1	56	1	56	\$36.96	\$2,069.76
State, Local or Tribal Government	Development of State Administrative Plan for the other needs provision of IHP / No Form	6	1	6	2	12	\$36.96	\$443.52
<b>Total</b>		<b>321,042</b>		<b>561,042</b>		<b>500,803</b>		<b>\$15,675,517.00</b>

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

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 all civilian workers is estimated to be \$31.30 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents all civilian workers is estimated to be \$15,673,004.00 annually.

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 Executive, Administrator or Manager positions, is estimated to be \$36.96 per hour; therefore, the estimated burden hour cost, to respondents Executive, Administrator or Manager Positions, is estimated to be \$2,513.28 annually.

The total estimated burden hour cost to respondents is estimated to be **\$15,675,517.00** 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.**

**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 recordkeeping, capital, start-up or maintenance costs associated with this information collection. These calculation and cost estimates were calculated with OMB collection 1660-0002.

**14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.**

**Annual Cost to the Federal Government**

Item	Cost (\$)
Contract Costs [Describe]	
Staff Salaries [For the workload of 321,045 respondents, 20 of GS-9, Step 1 employees spending approximately 10% of time annually processing the information received for this data collection. For the information received from the States (65 respondents) 12 of GS-14, Step 5 employees spending approximately 8.2% of their time reviewing the information from the States] [The current hourly basic rate of a GS-9/1 is \$19.92 or \$41,563 annually. The cost is calculated by multiplying the basic annual rate of a GS-9/1 by the number of staff (20). Total Cost = \$831,260.00.] [The current hourly basic rate of a GS-14/5 is \$45.99 or \$95,989 annually. The cost is calculated by multiplying 8.2% of the basic annual rate of a GS-14/5 by the number of staff (12). Total Cost = \$94,453.20]	\$1,295,998.48
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	

Printing	\$67,418.82
Postage [Approximately 585,000 annual number of data collection instruments x .225]	\$131,625.00
Other	
<b>Total</b>	<b>\$1,124,757.02</b>

\* Note: The "Salary Rate" includes a 1.4 multiplier to reflect a fully-loaded wage rate.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.**

*A "Program increase" is an additional burden resulting from an 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.*

**Explain:**

There are no changes to the annual hour burden and there has been no change to the information being collected.

<b>Itemized Changes in Annual Cost Burden</b>
---

Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Request for Approval of Late Registration / No Form	0	\$149,989.60	+\$149,989.60			
Administrative Option Agreement (for the other needs provision of IHP) / FEMA Form 010-0-11 (previously FF 90-153)	0	\$2,069.76	+\$2,069.76			
Request for Continued Assistance / FEMA Form 010-0-12	0	\$10,016,000.00	+\$10,016,000.00			
Appeal of Program Decision / No Form	0	\$5,507,015.90	+\$5,507,015.90			
Development of State Administrative Plan for the other needs provision of IHP / No Form	0	\$443.52	+\$443.52			
<b>Total(s)</b>	<b>0</b>	<b>\$15,675,517.00</b>	<b>+\$15,675,517.00</b>			

***Explain:***

There is an increase program change to the total cost to respondents from \$0 (2009) to \$15,675,517.00 (2011) as a result of an increase in the mean wage and the introduction of a multiplier (1.4) to account for a fully loaded average 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.**

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

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

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

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

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

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

There is no statistical methodology involved in this collection.