

July 24, 2013

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0085**

**Title: Crisis Counseling Assistance and Training Program**

**Form Number(s): FEMA Form 003-0-1 (ISP) and FEMA Form 003-0-2 (RSP)**

### 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 Crisis Counseling Assistance and Training Program (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 the provision of professional counseling services to survivors of major disasters 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 Program Regulations (44 CFR §206.171).

Section 416 of the Act is the authority under which the Department of Health and Human Services (HHS), through the Center for Mental Health Services (CMHS) within the Substance Abuse and Mental Health Services Administration (SAMHSA), coordinates

with FEMA in administering the Crisis Counseling Assistance and Training Program (CCP). U.S. Department of Homeland Security (DHS), FEMA and the U.S. Department of Health and Human Services Substance Abuse and Mental Health Services Administration have signed an interagency agreement to provide technical assistance and consultation to States applying for CCP funding.

The State collects the information to demonstrate that existing State resources are inadequate to meet the behavioral health needs of disaster survivors and that supplemental funds for counseling services are required. These counseling services are required in order to relieve mental health problems caused 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 allows FEMA and SAMHSA to determine the appropriate amount of supplemental resources needed. The nature of the information being collected is to ensure that the goals of the program are met; to identify special problems in the areas where technical assistance and guidance as they relate to crisis counseling assistance are required and to ensure that the grants are properly administered in accordance with all applicable laws and regulations.

**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 Crisis Counseling Assistance and Training Program (CCP) consist of two grant programs: the Immediate Services Program (ISP) and the Regular Services Program (RSP). The CCP provides supplemental funding to States, U.S. Territories and Federally Recognized Tribes after a Presidential disaster declaration. The ISP program is available for a limited period of time and is not to exceed 60 days from the date of declaration, unless an RSP application for longer-term funding is submitted. In that case, immediate services funding may be continued until the RSP application has been approved or disapproved. The RSP provides funding for up to nine months from the date of award. The information submitted in the application is provided on specific disasters for the consideration of funding to States, U.S. Territories, and Federally recognized Tribes to provide services for community outreach, consultation and public education, group and individual crisis counseling, referral and resource linkage and coping techniques.

**FEMA Form 003-0-1, Crisis Counseling Assistance and Training Program, Immediate Services Program Application** - FEMA requires that the State complete an ISP Application for the CCP that includes the following: (i) Standard Forms (SF-424) Application for Federal Assistance and the SF-424A, Budget Information for Non-Construction Programs, and required Assurances and Certifications; (ii) The geographical areas within the designated disaster area for which services will be provided; (iii) An estimate of the number of disaster survivors requiring assistance; (iv) A description of the State and local resources and capabilities, and an explanation of why these resources cannot meet the need; (v) A description of response activities from the date of the disaster

to the date of application; (vi) A plan of services to meet the identified needs; and (vii) A line-item budget with estimated funding levels for the State and Provider Agencies that includes contractual and in-kind costs. Estimated costs for proposed services are included in a separate budget from costs associated with reimbursement (interim costs) for any eligible services provided prior to submission of the ISP Application. FEMA and SAMHSA provide supplemental instructions for the ISP Application which describe the purpose of each application section. The instructions are used as guidance for State's completing the ISP Application. The burden includes the time required for training to complete the application.

**Final Report Narrative, (Immediate Services Program)** - Administrative and fiscal reporting during the ISP are included as a mid-program report in the RSP application if the State applies for an RSP. Regardless of the submission of an RSP application, the program must submit a final program and fiscal report to FEMA and CMHS within 90 days following the ISP program period end date.

**FEMA Form 003-0-2, Crisis Counseling Assistance and Training Program, Regular Services Program Application** - FEMA requires that the State complete an RSP Application for the CCP that includes the following:

- (i) Information about the scope and overall impact of the disaster and the characteristics of the affected communities;
- (ii) Description of the geographical areas within the designated disaster area for which services will be provided;
- (iii) Estimate of the number of disaster survivors requiring assistance. This documentation of need should include the extent of physical, psychological, and social problems observed, the types of mental health problems encountered by disaster survivors, and a description of how the estimate was made;
- (iv) Description of the State and local resources and capabilities, and an explanation of why these resources cannot meet the need;
- (v) Plan of Services to meet the identified needs, that includes a plan for staffing, program management and oversight, service provision, and training;
- (vi) Detailed budget, including identification of the resources the State and local governments will commit to the project, proposed funding levels for the different agencies if more than one is involved, and an estimate of the required federal contribution.

**Quarterly Report Narrative, (Regular Services Program)** – This is a new requirement. Historically, FEMA has utilized a Quarterly Report Narrative template to collect information on the progress goals of the RSP program since the CCP program's inception some 30 years ago. Quarterly progress reports, as requested by the Regional Administrator or the Secretary, are due 30 calendar days after the end of each three month reporting period. This is consistent with 44 CFR §13.40, Monitoring and Reporting Program Performance.

**Final Report Narrative, (Regular Services Program)** – This is a new requirement. Similar to the Quarterly Report Narrative, the Final Report Narrative format has historically been used (by FEMA) to collect information on the status of programmatic and fiscal objectives at the end of the program period. The CCP requests a final narrative program report that explains how funds were expended during the program performance period. The State must submit the SF-425 Federal Financial Report (OMB Approval Number: 0348-0061) to show final expenditures. The Final Report Narrative and the Federal Financial Report (SF-425) are due 90 calendar days after the last day of Regular Services funding. An accounting of funds, in accordance with 44 CFR §13.41, Financial Reporting, which includes the submission of the SF-425 Federal Financial Report, is to be submitted with the Final Report.

The Regular Services Program documents proposed under this collection are a new requirement. As a result of General Accountability Office (GAO) audits, including GAO 05-514 “*Lessons Learned from Project Liberty*”, FEMA has been asked to update its risk assessment procedures in order to more effectively monitor grantee performance and funds expenditures. FEMA has collected the information contained in these documents in the past but use of these documents has not been required. In an effort to increase effective programmatic and fiscal monitoring of these grants, FEMA is proposing to add these documents to the current collection and make them officially required of all applicants wishing to receive a Crisis Counseling Program grant.

**The Standard Forms listed below are used in FEMA administration of grant programs collections of information. These burden estimates are captured under the OMB government-wide collections of information for Standard Forms (SF) and other data collection activities approved by OMB.**

- (i) SF-424, Application for Federal Assistance, OMB Control#: 0348-0061, expiration date: 2/28/2015
- (vii) SF-424A, Budget Information for Non-Construction Programs, OMB Control#: 0348-0044, Rev. 7-97
- (viii) HHS-690-Assurance of Compliance regarding Civil Rights, Rev. 01/09
- (ix) HHS Checklist, OMB Control#: 0990-0317, expiration date: 10/31/2013
- (x) Project Performance Site Location Form, OMB Control#: 4040-0010, expiration date: 08/31/2011
- (xi) Standard Form LLL, Disclosure of Lobbying Activities Form, OMB Control#: 0348-0046, Rev. 7-97

**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 ISP and RSP applications are available on the CMHS website at <http://www.samhsa.gov/dtac/CCPtoolkit/CCPmaterials.htm> and may be electronically downloaded and emailed with an electronic signature from the Governor's Authorized Representative. This is a 100% electronic collection. Under the DHS Workplace Transformation Initiative, there are plans to fully automate this collection. However, FEMA Senior Leadership has not yet indicated when automation will be implemented and available for this collection.

When a State, U.S. territory or Tribal Government receives a Presidentially declared disaster declaration that includes Individual Assistance, the Disaster Technical Assistance Center (DTAC) will forward the respondent the following link via email <http://www.samhsa.gov/dtac/CCPtoolkit/CCPmaterials.htm>. Information found on the website include (1) the RSP application 003-0-2, (2) the ISP application 003-0-1, (3) the Final Report Narrative (ISP) template, (4) the Final Report Narrative (RSP) template and (5) the Quarterly Report Narrative (RSP) template. In addition, DTAC will provide the respondent a flash drive with the collection tools mentioned above pre-loaded for convenience.

**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.**

The information collected is disaster-specific and only applies to the specific event designated by a Presidentially-declared major disaster declaration. This information relates to the specific results of that disaster, including extent of damages, injuries, deaths, and the associated impact on designated counties and specific populations (children, nursing home residents, etc.). Therefore, the information is not collected or 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.**

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 for more than 3 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.**

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 October 11, 2012, 77 FR 61772. Four Comments were received from one respondent - Mr. W. Nim Kidd, Assistant Director, for the Texas Department of Public Safety. A summary of each comment is listed below:

(1) It is recommended that indirect costs be an allowable cost under the grant and terms of conditions for the CCP program. Indirect costs are not allowable under current federal regulations. The significant amount of resources required to develop and submit the grant application, process expenditures, monitor program activities and the preparation of required programmatic and fiscal reports, among other issues, were addressed as justification.

(2) A recommendation was made to extend the ISP performance period from 60 days to 6 months. The issue discussed was that the 60-day ISP grant program period is not sufficient time to prepare and submit the required application (due 14-days from the date of the IA declaration) hire staff, initiate contracts with local mental health providers and provide on-going response activities to those impacted by the disaster.

(3) The recommendation to automatically turn on the CCP program during an IA declaration was raised, similar to what happens for some FEMA programs. Based on FEMA regulations, the state must submit an ISP application within 14 days of the IA declaration. Funding is based on submission and approval of the application.

(4) Final recommendation is to pre-approve certain sections of the ISP application to expedite the award process so that the state can quickly access disaster funding to provide immediate services to impacted populations.

No other comments were received from any other commenter. The above comments are currently being reviewed by the Community Services Section staff at FEMA Headquarters in collaboration with the Office of Chief Counsel, FEMA Regional Offices

and staff from CMHS. FEMA does not anticipate that these comments will impact changes to the collection.

A 30-day Federal Register Notice inviting public comments was published on February 11, 2013, 78 FR 9711. 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 and CMHS provide annual CCP trainings and workshops for State representatives at the Emergency Management Institute in Emmitsburg, Maryland. The objective of the workshops is to train States on how to complete applications for the Regular Services Program (RSP), FEMA Form 003-0-2 and the Immediate Services Program (ISP), FEMA Form 003-0-1. Anecdotal feedback is collected from States during general discussions in this training class. A formal feedback form is not used. In addition, FEMA in coordination with SAMSHA informally obtains feedback from States on overall application, reporting, program strengths and weaknesses during routine grantee monitoring conference calls and emails.

**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 Project Officers 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.**

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 by FEMA and adjudicated by the DHS Privacy Office on July 17, 2012. The final results of the PTA have been adjudicated as a privacy sensitive system. The system used is covered by an existing Privacy Impact Assessment (PIA), Grant Management Programs approved by DHS on July 14, 2009 and an existing System of Records Notice (SORN), DHS-FEMA-004 Grant Management Information Files, 74 FR 39705 approved by DHS on August 7, 2009.

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

**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.**

FEMA receives an average (based on past three years) of 15 States that participate annually in the CCP Program. FEMA receives an average of 15 ISP applications annually. (15 respondents x 72 Avg. burden hours per response = 1080 total annual burden hours).

Each State participating in the CCP must submit a final report narrative, which is due within 90 days after the end of the program performance period. (15 respondents x 10 Avg. burden hours per response = 150 total annual burden hours).

It is estimated that 9 State Disaster Mental Health Coordinators will complete FEMA Form 003-0-2. Each respondent will spend approximately 60 hours (4 hours each day for 15 days) preparing to submit the RSP application. The total annual burden in hours is  $9 \times 60 \text{ hours} = 540 \text{ hours}$ .

It is estimated that 9 State Disaster Mental Health Coordinators will complete a Quarterly Report Narrative. Each respondent will spend approximately 30 hours (15 hours per week for a two week period) compiling programmatic and fiscal data submitted by Service Providers. The total annual hour burden is  $9 \times 30 \text{ hours} = 270 \text{ hours}$ .

It is estimated that 9 State Disaster Mental Health Coordinators will complete a Final Report Narrative due within 90 days after the end of the performance program period. Each respondent will spend approximately 60 hours (5 hours per week for a 12 week period) compiling programmatic and fiscal data received from service providers and previously submitted quarterly reports. The total annual hour burden is  $9 \times 60 \text{ hours} = 540 \text{ hours}$ .

**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.**

Table A.12: Estimated Annualized Burden Hours and Costs

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 Crisis Counseling Assistance and Training Program, Immediate Services Program Application / FEMA Form 003-0-1	15	1	72 hours	1080	\$55.30	\$59,724.00
State Disaster Mental Health Coordinator	CCP/ISP Final Report Narrative, (Immediate Services Program) / No form #	15	1	10 hours	150	\$55.30	\$8,295.00
State Disaster Mental Health Coordinator	CCP/RSP Crisis Counseling Assistance and Training Program, Regular Services Program Application / FEMA Form 003-0-2	9	1	60 hours	540	\$55.30	\$29,862
State Disaster Mental Health Coordinator	CCP/RSP Quarterly Report Narrative, (Regular Services Program) / No form #	9	1	30 hours	270	\$55.30	\$14,931
State Disaster Mental Health Coordinator	CCP/RSP Final Report Narrative, (Regular Services Program) / No form #	9	1	60 hours	540	\$55.30	\$29,862
<b>Total</b>		<b>57</b>			<b>2,580</b>		<b>\$142,674</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 State Disaster Mental Health Coordinator is estimated to be \$55.30 per hour including the wage rate multiplier, therefore, the estimated burden hour respondent cost is estimated to be \$142,674.

FEMA is actively working to reduce the burden to respondents (states) that apply for the Crisis Counseling Immediate and Regular Services Programs. FEMA invited various stakeholders and regional partners to participate in a meeting held from September 17 – 20 in Chicago, Illinois, to determine existing challenges, gaps and factors that hinder the effective and expedient implementation of the CCP program.

One outcome of the meeting was the creation of several working groups (i.e., ISP/RSP Applications, Guidance document, Financial Processes, Roles and Responsibilities, and CCP Assessment), tasked with developing deliverables to improve program delivery and subsequently, reduce the burden to states (respondents). The working groups have been meeting regularly for approximately one year. As a follow-up from the first meeting, FEMA will host a second meeting the week of August 26 in Chicago, Illinois. The working groups will be invited to present deliverables developed during the past year for discussion and next steps.

Furthermore, to expedite funding to states devastated by Super Storm Sandy, FEMA HQ utilized an expedited ISP application (reduced from 25 pages to 5) designed to reduce the burden to states applying for the CCP program.

**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 record keeping, capital, start-up or maintenance costs associated with this information collection.

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

**Annual Cost to the Federal Government (ISP and RSP Application)**

Item	Cost (\$)
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] $\$60.48 \times 40 \times 15 = \$36,288 + 89.59 \times 40 \times 15 = \$53,754$ ; $\$36,288 + 53,754 = \$90,042$ . 'ISP'	\$90,042
Staff Salaries [one GS-12 (@ \$35.88/hr. (times 1.4 multiplier = \$ 50.23) and one GS-14 @\$50.41/hr. (times 1.4 multiplier = 70.57), 40 hours each per RSP] $\$50.23 \times 40 \times 9 = \$18,083 + \$70.57 \times 40 \times 9 = \$25,405$ ; $\$18,083 + \$25,405 = \$43,488$ 'RSP'	\$43,488
Facilities [cost for renting, overhead, etc., for data collection activity]	
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) $\$50.23 + \$141.14 \times 32 = \$6,124$	\$6,124
<b>Total</b>	<b>\$139,654</b>

The FEMA Region Crisis Counseling Specialist and the CMHS Project Officer provide 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 ISP 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

The FEMA Region Crisis Counseling Specialist and the CMHS Project Officer provide technical assistance on the development of the Regular 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 Regular Services Program.

It is estimated that one FEMA Crisis Counseling Specialist GS-12 (\$50.23 per hour) spends approximately 40 hours per RSP x 9 Regular Services grants during a calendar year for on and off-site technical assistance = \$18,083. A CMHS Project Officer GS-14 (\$70.57 hour) spends approximately 40 hours per RSP x 9 Regular Services grants during a calendar year for on and off site technical assistance = \$25,405. The total cost for technical support to the RSP is estimated to be \$43,488.

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 FEMA GS-12 (\$50.23 per hour) and two CMHS GS-14s (\$70.57 each per hour) spend 32 hours each per course training at this workshop. The cost for the training is estimated to be \$6,124.

Therefore, the total cost for the Immediate and Regular Services Program staff salaries, including training is estimated to be \$139,654. 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.**

*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.*

<b>Itemized Changes in Annual Burden Hours</b>						
<b>Data collection Activity/Instrument</b>	<b>Program Change (hours currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (hours currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
<b>CCP/ISP</b> Crisis Counseling Assistance and Training Program, Immediate Services Program Application / FEMA Form 003-0-1				1080	1080	0
<b>CCP/ISP</b> Final Report Narrative, (Immediate Services Program) / No form #				150	1080	0
<b>CCP/RSP</b> Crisis Counseling Assistance and Training Program, Regular Services Program Application / FEMA Form 003-0-2		540	+540			
<b>CCP/RSP</b> Quarterly Report Narrative, (Regular Services Program) / No form #		270	+270			
<b>CCP/RSP</b> Final Report Narrative, (Regular Services Program) / No form #		540	+540			
<b>Total(s)</b>		<b>1350</b>	<b>+1,350</b>	<b>1230</b>	<b>1,230</b>	<b>0</b>

***Explain:***

There was an increase in burden hours from 1,230 to 2,580 (+1,350) for this collection of information. This adjustment in burden hours is due to the addition of FEMA Form 003-0-2 (Regular Services Application), the Quarterly Report Narrative and the Final Report Narrative to this collection.

The Regular Services Program documents proposed under this collection are a new requirement. As a result of General Accountability Office (GAO) audits, including GAO 05-514 “*Lessons Learned from Project Liberty*”, FEMA has been asked to update its risk assessment procedures in order to more effectively monitor grantee performance and funds expenditures. FEMA has collected the information contained in these documents in the past but use of these documents has not been required. In an effort to increase effective programmatic and fiscal monitoring of these grants, FEMA is proposing to add

these documents to the current collection and make them officially required of all applicants wishing to receive a Crisis Counseling Program grant.

<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>
<b>CCP/ISP</b> Crisis Counseling Assistance and Training Program, Immediate Services Program Application / FEMA Form 003-0-1				\$59,724	0	-\$59,724
<b>CCP/ISP</b> Final Report Narrative, (Immediate Services Program) / No form #				\$8,295	0	-\$8,295
<b>CCP/RSP</b> Crisis Counseling Assistance and Training Program, Regular Services Program Application / FEMA Form 003-0-2		\$0				
<b>CCP/RSP</b> Quarterly Report Narrative, (Regular Services Program) / No form #		\$0				
<b>CCP/RSP</b> Final Report Narrative, (Regular Services Program) / No form #		\$0				
<b>Total(s)</b>		<b>\$0</b>		<b>\$68,019</b>	<b>0</b>	<b>-\$68,019</b>

***Explain:***

The cost of \$0 is a correction from the previous approval. This is a decrease in cost from the previous OMB Inventory. The way cost is reported in this table is now changed as it comes from question 13 which has values of zero. Therefore negative costs are now reflected to account for a change in how cost was previously recorded.

**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 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.