



FEMA

September 3, 2013

MEMORANDUM FOR: Margaret H. Graves
Deputy Chief Information Officer
Office of the Under Secretary for Management
Department of Homeland Security

FROM: Charlene D. Myrthil
Director, Records Management Division
Office of the Chief Administrative Officer
Mission Support

SUBJECT: Emergency Approval for Changes to OMB Collection 1660-0002
and OMB Collection 1660-0061 Disaster Assistance Registration
Process

The Federal Emergency Management Agency (FEMA) seeks emergency approval for changes to two interrelated existing approved collections of information. In light of recently enacted laws and the arrival of hurricane season, it is vital that these changes be implemented sooner than time limits employed under normal Office of Management and Budget (OMB) review and clearance procedures.

In response to Super Storm Sandy (October 2012), Congress added "child care" expenses as a category of disaster assistance to FEMA's Individuals and Households Program (IHP) through the Sandy Recovery Improvement Act of 2013 (SRIA), Pub. L. No. 113-2. Section 1108 of the SRIA amends section 408(e)(1) of the Stafford Act (42 U.S.C. § 5174(e)(1)), giving FEMA the specific authority to pay for "child care" expenses as disaster assistance under the Other Needs Assistance (ONA) provision of IHP in addition to funeral, medical and dental expenses.

Upon a Presidentially declared disaster that grants funding for IHP, FEMA begins collecting information from survivor/registrants in order to determine eligibility for IHP. FEMA's current registration application script for IHP disaster assistance does not ask questions regarding a survivor/registrant's need to cover "child care" expenses associated with a disaster and FEMA's Administrative Selection form for States does not yet include a selection option for "child care" expenses. Thus, FEMA needs to change its application and State Administrative Selection forms to include a question about whether the survivor/registrant needs financial assistance for child care expenses as a result of a disaster and whether the State wants to administer this funding or not. FEMA also needs to collect necessary paperwork from the survivor/registrant to verify the expenses associated with child care through correspondence with the survivor/registrant.

FEMA's mission is "to support our citizens and first responders to ensure that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards." The lynchpin is the relationship among FEMA, the disaster survivor/registrants, and declared States. If FEMA does not have the ability to ask survivor/registrants whether they need disaster assistance for child care expenses, and whether the State wishes to administer this funding, then FEMA will not be able to properly identify those who would qualify for this new line of ONA assistance and fail to properly carry out the mandates of section 1108 of SRIA.

If OMB were to employ the normal clearance procedures for these changes, they would likely not go into effect until after the current hurricane season has ended, a period where FEMA usually has a high volume of Presidentially declared disasters that necessitate IHP assistance. Thus, it is imperative and crucial for OMB to approve emergency changes to OMB ICRs 1660-0002 and 1660-0061 as prescribed under 44 U.S.C. § 3507(j)(1) and (2). Thank you for your consideration.