**Narrative of Changes**

*The purpose of the Narrative of Changes is to clearly indicate changes to a collection since the previous approval.*

Collection Title: Crisis Counseling Assistance and Training Program

OMB Control No.: 1660-0085

Current Expiration Date: August 31, 2014

 Collection Instruments: FEMA Form 003-0-1, Immediate Services Program (ISP); FEMA Form 003-0-2 Regular Services Program (RSP)

The following are the changes to the collection:

FEMA Form 003-0-1 Immediate Services Program (ISP) has been reduced from 26 pages to 4 pages.

FEMA Form 003-0-2 Regular Services Program (RSP) has been reduced from 27 pages to10 pages. See supporting statement for additional information in regards to both FEMA forms.

Supporting Statement:

Question 1 – Updated to reflect changes to CCP program.

Question 2 – Updated to reflect changes to the ISP and RSP applications.

Question 10 – Updated to reflect current privacy information.

Question 12 – Updated to reflect a decrease in burden hours.

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| **Type of Respondent** | **Form Name / Form Number** | **No. of Respon-dents** | **No. of Respon-ses per Respon-dent** | **Total No. of Responses** | **Avg. Burden per Response (in hours)** | **Total Annual Burden (in hours)** | **Avg. Hourly Wage Rate** | **Total Annual Respondent Cost** |
| State, local or Tribal Government | CCP/ISP Crisis Counseling Assistance and Training Program, Immediate Services Program Application /FEMA Form 003-0-1 | 15 | 1 | 15 | 8 hours | 120 | 55.76 | $6,691 |
| State, local or Tribal Government | CCP/ISPFinal Report Narrative, (Immediate Services Program) /No Form # | 15 | 1 | 15 | 8 hours | 120 | 55.76 | $6,691 |
| State, local or Tribal Government | CCP/RSP Crisis Counseling Assistance and Training Program, Regular Services Program Application / FEMA Form 003-0-2 | 15 | 1 | 15 | 20 hours | 300 | $55.76 | $16,728 |
| State, local or Tribal Government | CCP/RSPQuarterly Report Narrative, (Regular Services Program) /No Form # | 15 | 2 | 30 | 15 hours | 450 | 55.76 | $25,092 |
| State, local or Tribal Government | CCP/RSPFinal Report Narrative, (Regular Services Program) /No Form # | 15 | 1 | 15 | 30 hours | 450 | $55.76 | $25,092 |
| State, local or Tribal Government | Standard Form 424 | 15 | 1 | 15 | 1 hour | 15 | $55.76 | $836.40 |
| State, local or Tribal Government | Standard Form 424A | 15 | 1 | 15 | 1 hour | 15 | $55.76 | $836.40 |
| State, local or Tribal Government | Standard Form 425 | 15 | 1 | 15 | 1 hour | 15 | $55.76 | $836.40 |
| State, local or Tribal Government | Project Performance Site Location Form | 15 | 1 | 15 | 1 hour | 15 | $55.76 | $836.40 |
| State, local or Tribal Government | Standard HHS Checklist Form | 15 | 1 | 15 | 1 hour | 15 | $55.76 | $836.40 |
| **Total** |   | **150** |  | **165** |  | **1,515** |  | **$84,476.40** |

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

Question 14 costs to the Federal Government updated.

Question 15 – Burden hour decrease explained.

***Insert full explanation and chart from 15 as highlighted below.***

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| **Itemized Changes in Annual Burden Hours** |
| **Data collection Activity/Instrument** | **Program Change (hours currently on OMB Inventory)**  | **Program Change (New)**  | **Difference** | **Adjustment (hours currently on OMB Inventory)** | **Adjustment (New)**  | **Difference** |
| CCP/ISP Crisis Counseling Assistance and Training Program, Immediate Services Program Application /FEMA Form 003-0-1 |   |   |   | 1080  | 120  | -960  |
| CCP/ISPFinal Report Narrative, (Immediate Services Program) /No Form # |   |   |   | 150  | 120  | -30  |
| CCP/RSP Crisis Counseling Assistance and Training Program, Regular Services Program Application / FEMA Form 003-0-2 |   |   |   | 540 | 300  | -240  |
| CCP/RSPQuarterly Report Narrative, (Regular Services Program) /No Form # |   |   |   | 270  | 450  | +180 |
| CCP/RSPFinal Report Narrative, (Regular Services Program) /No Form # |  |  |  | 540 | 450  | -90  |
| Standard Form 424 |  | **15** | **+15** |  |  |  |
| Standard Form 424A |  | **15** | **+15** |  |  |  |
| Standard Form 425 |  | **15** | **+15** |  |  |  |
| Project Performance Site Location Form |  | **15** | **+15** |  |  |  |
| Standard HHS Checklist Form |  | **15** | **+15** |  |  |  |
| **Total(s)** |  | **75** | **+75** | **2,580** | **1440** | **-1140** |

***Explain:***

There was a decrease in total burden hours from 2,580 to 1,515 due to revisions to the ISP application, FEMA Form 003-0-1 (Immediate Services Program) and the RSP application, FEMA Form 003-0-2 (Regular Services Application). However, the RSP quarterly report increased the burden from 270 to 450 annual burden hours while four standard forms were added to this collection that included 75 additional burden hours. Refer below for explanations:

* Reduced the number of pages for the ISP from 26 pages to 4 pages and the RSP from 27 to 10 pages;
* fewer questions being asked - limited questions to what is required by the regulations and eliminated extraneous questions;
* reduced redundancy by eliminating duplicative questions;
* reduced and removed some instructions and placed those in guidance instead of on the form itself; and
* removed budget tables that are no longer required in the application.
* Increased the burden hours for the RSP quarterly report from 270 to 450 to reflect the requirement of two quarterly reports instead of one report during the 9 month reporting period; this information was not captured during the last revision of the collection package.
* Added four standard forms (SF-424, SF-424A, SF-425, HHS-Checklist, and HHS Project Performance Site Location) to capture the burden for this program. The standard forms are accounted for under OMB Collection 1660-0025. However, in order to provide more transparency and avoid conflicting collection renewal periods, the standard forms are included as part of this collection.

FEMA continues to examine and revise the CCP grant program processes and procedures to make it more efficient, cost effective and less burdensome for respondents, while improving service delivery to disaster survivors.