

January 27, 2021

**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; Immediate Services Program (ISP) and FEMA Form 003-0-2; Regular Services Program (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, Tribal 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 provision 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 U.S. 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 HHS/CMHS/SAMHSA have signed an interagency agreement under which HHS-CMHS provides program oversight, technical assistance and training to States applying for CCP funding.

The respondent collects the information to demonstrate that (1) existing resources are inadequate to meet the behavioral health needs of disaster survivors and (2) supplemental funds for counseling services are necessary. These counseling services are necessary in order to relieve mental health problems caused or aggravated by a major disaster or its aftermath. 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 necessary 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 major 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 disaster-specific and is for the consideration of funding 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 respondent 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 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; and (vi) A plan of services to meet the identified needs.

Unauthorized Use of Draft FEMA Form 003-0-1, Crisis Counseling Assistance and Training Program, Immediate Services Program Application: During April 2014, FEMA used the draft version of the ISP application to evaluate whether the State of Washington needed the ISP portion of the Crisis Counseling Program for the Washington State mudslides that occurred on March 22, 2014. Washington State was approved for the ISP portion of the Crisis Counseling Program and FEMA only utilized the ISP draft application during this one incident. FEMA will not use the ISP or RSP applications until OMB has approved both forms for use. FEMA is disclosing the unauthorized use for transparency purposes during the OMB review and approval process.

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 respondent 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 respondent complete an RSP Application for the CCP that includes the following:

- (i) Description of response activities from the date of the disaster to the date of application;
- (ii) Information about the scope and overall impact of the disaster and the characteristics of the affected communities;
- (iii) Description of activities undertaken since the completion of the RSP assessment and a brief description of the impacted population;
- (iv) Description of State, Tribal 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 an organizational chart, program management administrative oversight, service provision, and training;
- (vi) Standard Forms (SF-424) Application for Federal Assistance and the SF-424A, Budget Information for Non-Construction Programs, and required Assurances and Certifications; including a detailed budget narrative.

Quarterly Report Narrative, (Regular Services Program) – 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) – The respondent must submit a final narrative program report that explains how funds were expended during the program performance period. The respondent must also 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.

CCP also uses five Standard Forms in this collection. The standard forms are accounted for under OMB Collection 1660-0025 however, in order to provide more transparency and avoid conflicting collection renewal periods and to capture the burden for this program; CCP now includes these Standard Forms in this collection. **To download a copy of each form below, go to the following website and search by name:**
<http://www.grants.gov/web/grants/forms/sf-424-family.html#sortby=1>

Application for Federal Assistance, (SF-424) OMB Control#: 0348-0061, expires 02/28/2015; the SF-424 is the official application for federal assistance that the respondent is required to complete to request federal funding.

Budget Information for Non-Construction Programs, (SF-424A) OMB Control#: 0348-0044, expires 06/30/2014; the SF-424A is required to show the amount of Federal funding requested for each cost category within a line-item budget.

Federal Financial Report, (SF-425) OMB Control#: 0348-0061, expires 02/28/2015; this form may be found at http://www.whitehouse.gov/omb/grants_forms. The SF-425 is the Federal Financial Report that the respondent is required to fill out to provide accountability for all Federal expenditures through the end of the grant performance period.

HHS Checklist/08-2007, expires 01/31/2017; The HHS Checklist is to assure that proper signatures, assurances, and certifications have been submitted. The HHS Checklist also ensures that pertinent information has been addressed and included in the application and that the name and contact information for the business official and program director are recorded.

HHS Project Performance Site Location Form - expires 09/30/2016. The HHS Project Performance Site Location Form is used to indicate the primary site where the work will be performed.

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.

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://samhsa.gov/dtac/ccptoolkit/intro.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.

A project officer from SAMHSA will contact the respondent to share information about the CCP grant and answer any questions. The respondent will fill out the appropriate application on-line (with technical support provided from SAMHSA and FEMA) and email the completed copy to SAMHSA and FEMA HQ for review and approval. The email address used will be determined by the assigned recipients in SAMSHA (Project Officer) and FEMA (Program Specialist).

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 respondent'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 June 13, 2014, 79 FR 33931. 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 August 26, 2014, 79 FR 50925. 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 respondents at the Emergency Management Institute in Emmitsburg, Maryland. The objective of the workshop is to train respondents on how to complete an application for the RSP, FEMA Form 003-0-2 and the ISP, FEMA Form 003-0-1. Anecdotal feedback is collected from respondents 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 respondents 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 HHS/CMHS/SAMHSA have signed an interagency agreement under which CMHS provides technical assistance and consultation to respondents applying for CCP funding. FEMA trains, mentors and provides guidance to a cadre of Project Officers responsible for providing the respondent 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. Re:

A Privacy Threshold Analysis (PTA) was completed by FEMA and adjudicated by the DHS Privacy Office on May 12, 2014.

This collection is covered by an existing Privacy Impact Assessment (PIA), DHS/FEMA/PIA-013 – Grant Management Programs, approved by DHS on July 14, 2009 and the existing System of Record Notice (SORN), is DHS/FEMA-009 – Hazard Mitigation Assistance Grant Programs, 77 FR 17783 approved by DHS on July 23, 2012.

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.

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 receives an average of 15 ISP applications (FEMA form 003-0-1) annually for funding consideration. (15 respondents x 8 avg. burden hours per response = 120 annual burden hours).

Each respondent will also submit a final ISP report narrative, which is due within 90 days after the end of the program performance period. (15 respondents x 8 avg. burden hours per response = 120 total annual burden hours).

It is estimated that 15 respondents will complete FEMA Form 003-0-2 or RSP application. Each respondent will spend approximately 20 hours (4 hours each day for 5 days) completing the application. **The total annual burden in hours is 15 x 20 hours = 300 hours.**

It is estimated that 15 respondents will complete two Quarterly Report Narratives during the RSP performance period. Each respondent will spend approximately 15 hours per report (3 hours per day for 5 business days) preparing each report. **The total annual hour burden is 15 (respondents) x 2 (reports) x 15 (hours) = 450 hours.**

It is estimated that 15 respondents will complete a Final RSP Report Narrative due within 90 days after the end of the performance program period. Each respondent will spend approximately 30 hours (2 hours per day for 15 business days) compiling programmatic and fiscal data. **The total annual hour burden is 15 (respondents) x 30 (hours) = 450 hours.**

Each respondent participating in the CCP must submit an application for federal assistance or SF-424 form and the Budget Information for Non-Construction Programs or SF-424A. **(15 respondents x 1 avg. burden hours per response = 15 annual burden hours for each form.**

Each respondent participating in the CCP must submit a Federal Financial Report or SF-425 form. **(15 respondents x 1 avg. burden hours per response = 15 annual burden hours for each form.**

Each respondent must also complete the HHS Checklist and Project Performance Site Location Form. **(15 respondents x 1 avg. burden hours per response = 15 annual burden hours for each form.**

The total annual burden hours for all required forms is 120+120+300+450+450 + 75 = 1,515 hours

Type of Respondent	Form Name / Form Number	No. of Responses	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
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/ISP Final 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/RSP Quarterly Report Narrative, (Regular Services Program) / No Form #	15	2	30	15 hours	450	55.76	\$25,092
State, local or Tribal Government	CCP/RSP Final Report Narrative, (Regular Services Program) / No Form #	15	1	15	30 hours	450	\$55.76	\$25,092
State, local or Tribal Government	Application for Federal Assistance / Standard Form 424	15	1	15	1 hour	15	\$55.76	\$836.40
State, local or Tribal Government	Budget Information for Non-Construction Programs / Standard Form 424A	15	1	15	1 hour	15	\$55.76	\$836.40
State, local or Tribal Government	Federal Financial Report / Standard Form 425	15	1	15	1 hour	15	\$55.76	\$836.40
State, local or Tribal Government	Project / Performance Site Location(s) 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.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for State Disaster Mental Health Coordinator is estimated to be \$55.76 per hour including the wage rate multiplier, therefore, the estimated burden hour respondent cost is estimated to be \$84,476.40.

FEMA is actively working to reduce the burden to respondents that apply for the Crisis Counseling Immediate and Regular Services Programs as evident by the reduction in

hours and cost to the respondent, indicated in *Table A.12: Estimated Annualized Burden Hours and Costs*. FEMA has organized three meetings with stakeholders and regional partners with the purpose of reducing the burden to respondents and improving the processes and procedures to ensure the expedient implementation of the CCP program.

The first meeting was held in Chicago, Illinois from September 17-20, 2012. One important 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 respondents. The working groups have been meeting regularly for approximately 15 months to meet the deliverables assigned.

The second meeting was held in Denver, Colorado, from January 13 - 17th, 2014. Major milestones were achieved at this meeting. The working groups presented on the deliverables achieved to date. One deliverable was the reduction of the ISP application from 26 pages to 5 pages and the RSP application from 27 to 10 pages. Both applications will be available online at <http://samhsa.gov/dtac/ccptoolkit/intro.htm>. Including the revisions to the ISP and RSP applications, other program deliverables are being developed that will further reduce the burden while improving overall program delivery and services to disaster survivors.

The next meeting was held the week of May 5 – 9, 2014, in Atlanta, Georgia. The purpose of this meeting was to present the final version of the ISP and RSP applications, and other program deliverables to our regional partners. Both applications have been finalized.

13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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

Item	Cost (\$)
Contract Costs [Describe]	0
Crisis Counseling Specialist/CMHS Project Officer - Salaries [one GS-12 (@ \$36.36/hr. (times 1.4 multiplier = \$50.90) and one GS-13 @\$43.23/hr. (times 1.4 multiplier = \$60.52) 20 hours each per ISP] $\$50.90 \times 20 \times 15 = \$15,270 + 60.52 \times 20 \times 15 = \$18,156$; $\$15,270 + 18,156 = \$33,426$; 'ISP'	\$33,426
Crisis Counseling Specialist/CMHS Project Officer - Salaries [one GS-12 (@ \$36.36/hr. (times 1.4 multiplier = \$50.90) and one GS-13 @\$43.23/hr. (times 1.4 multiplier = \$60.52), 40 hours each per RSP] $\$50.90 \times 40 \times 15 = \$30,540 + \$60.52 \times 40 \times 15 = \$36,312$; $\$36,312 + \$30,540 = \$66,852$; 'RSP'	\$66,852
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 - $\$50.90 + 60.52 + \$121.04 = \$232.46 \times 32 = \$7,438.72$	\$7,439
Total	\$107,717

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

The FEMA Crisis Counseling Specialist and the CMHS Project Officer provide technical assistance on completing 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 respondent. The FEMA Regional Crisis Counseling Specialist also monitors and closes out the Immediate Services Program. It is estimated that one

FEMA Crisis Counseling Specialist GS-12 (\$50.90 per hour) spends approximately 20 hours per ISP x 15 Immediate Services grants during a calendar year for on and off-site technical assistance = \$15,270. A CMHS Project Officer GS-13 (\$60.52 per hour) spends approximately 20 hours per ISP x 15 ISP grants during a calendar year for on and off site technical assistance = \$18,156. The total cost for technical support to the ISP is estimated to be **\$33,426**.

The FEMA 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 respondent. 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 (\$50.90 per hour) spends approximately 40 hours per RSP x 15 Regular Services grants during a calendar year for on and off-site technical assistance = \$30,540. A CMHS Project Officer GS-13 (\$60.52 hour) spends approximately 40 hours per RSP x 15 Regular Services grants during a calendar year for on and off site technical assistance = \$36,312. The total cost for technical support to the RSP is estimated to be **\$66,852**.

FEMA/CMHS provide one annual CCP training and workshop for respondents at the Emergency Management Institute in Emmitsburg, Maryland. The objective of the workshop is to train respondents on how to complete an application successfully and obtain their feedback on the strengths and weakness of the application process. One FEMA GS-12 (\$50.90 per hour) and one FEMA GS -13 (\$60.52 each per hour) and two CMHS Project Officer GS-13s (\$60.52 each per hour x2 =\$121.04) spend 32 hours each per course training at this workshop. The cost for the training is estimated to be **\$7,439**

Therefore, the total cost for the Immediate and Regular Services Program staff salaries, including training is estimated to be **\$107,717**. 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.

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/ISP Final 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/RSP Quarterly Report Narrative, (Regular Services Program) / No Form #				270	450	+180
CCP/RSP Final Report Narrative, (Regular Services Program) / No Form #				540	450	-90
Application for Federal Assistance / Standard Form 424		15	+15			
Budget Information for Non-Construction Programs / Standard Form 424A		15	+15			
Federal Financial Report / 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 Application) and the RSP application, FEMA Form 003-0-2 (Regular Services Program 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 five 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.

Itemized Changes in Annual Cost Burden

Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
CCP/ISP Crisis Counseling Assistance and Training Program, Immediate Services Program Application / FEMA Form 003-0-1				0	0	
CCP/ISP Final Report Narrative, (Immediate Services Program) / No form #				0	0	
CCP/RSP Crisis Counseling Assistance and Training Program, Regular Services Program Application / FEMA Form 003-0-2				0		
CCP/RSP Quarterly Report Narrative, (Regular Services Program) / No form #				0		
CCP/RSP Final Report Narrative, (Regular Services Program) / No form #				0		
Application for Federal Assistance / Standard Form 424		\$0				
Budget Information for Non-Construction Programs / Standard Form 424A		\$0				
Federal Financial Report / Standard Form 425		\$0				
Project Performance Site Location Form		\$0				
Standard HHS Checklist Form		\$0				
Total(s)		\$0				

Explain:

There is no cost burden for this collection.

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.