

## **THE SUPPORTING STATEMENT**

### **Specific Instructions**

#### **A. Justification**

##### **1. Circumstances making the collection of information necessary.**

Section 426 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. §5189d authorizes the Federal Emergency Management Agency (FEMA) and the U.S. Department of Health Services' Administration for Children and Families (ACF) to provide Immediate Disaster Case Management (IDCM) services under the federal Disaster Case Management Program (DCMP).

The use of the Electronic Case Management Record System (ECMRS) is aligned with Executive Order of the President 13589 and the memorandum to the Heads of Executive Departments and Agencies M-12-12 from the Office of Management and Budget to "Promote Efficient Spending to Support Agency Operations."

##### **2. Purpose and use of the information collection.**

The primary purpose of the information collection pertains to ACF/OHSEPR's initiative to improve the intake process and delivery of case management services to individuals and households impacted by a disaster. Further, the information collection will be used to support ACF/OHSEPR's goal to quickly identify critical gaps, resources, needs, and services to support State, local and non-profit capacity for disaster case management and to augment and build capacity where none exists. Information provided by individuals impacted by disasters will be collected by BCFS Health and Human Services, contract support for ACF/OHSEPR, under Contract HHSP233201400031I. All information gathered will be exclusively used to inform the delivery of disaster case management services and programmatic strategies and improvements. The questions within the assessment are standardized and remain the same for each disaster site.

ACF/OHSEPR seeks to improve the collection and storage of client data and optimize transfer of case files to State partners upon IDCM program closure. This will represent the first federal disaster ECMRS system and will serve to optimize services delivered to individuals and households impacted by a disaster. The electronic case record will improve service quality to disaster survivors, and will better support State/Tribal/Territorial and Federal planning for disaster survivors' human service needs. Additionally, the ECMRS is directly aligned with OHSEPR's mission to promote resilience of vulnerable individuals, children, families, and communities impacted by disasters.

The different categories of information being collected through the intake assessment form are designed to best meet the needs of populations in the immediate post disaster period. The form gathers housing, transportation, employment, financial, legal, language, child and youth, food,

clothing, furniture and appliances, senior, and health-care related needs information as part of a comprehensive assessment. The questions are specifically designed to collect pre and post disaster information that enables the coordination of assistance for individuals and families to receive disaster relief assistance from multiple organizations providing services during a disaster event. The intake assessment form is projected to be deployed in fiscal year 2016.

### **3. Use of improved information technology and burden reduction.**

Information will be collected by using a web-based system that allows for centralization of information collected with clear process-oriented workflows that enhances a disaster case manager's ability to minimize the time processing each individual impacted by a disaster. In addition to improving the information collection process, the ECMRS will promote centralization of information and resources, allowing disaster case managers to quickly connect individuals impacted by disaster with resources and services of multiple agencies. ECMRS will allow configuration to align with needs of the State, Tribe, or Territory that are disaster and mission specific. Response options on the ECMRS will be logic-driven to minimize redundancies. For instance, if a client impacted by a disaster indicates that he or she does not have children, the *Child and Youth Assessment* section will be skipped by the ECMRS.

There are two versions of this Paper Reduction Act request: **1)** paper intake assessment that will be used until ECMRS is implemented and operational and **2)** Electronic Case Record platform. The ECMRS will greatly reduce respondent burden through built-in algorithms that will streamline response options and patterns. All information gathered will be exclusively used to inform the delivery of disaster case management services and programmatic strategies and improvements.

The collection of information, both through the paper-based form and electronic method (i.e., ECMRS) will be contingent on activation following a Presidential declaration of a disaster. A Presidentially declared disaster and the activation of IDCM program cannot be predicted given the unpredictable nature of disasters. For the purpose of this request, all estimates are based on one disaster per year. It is however important to note that there may be none, one, or more than one disasters per year that rise to the IDCM program level. The use of an ECMRS system will improve and synchronize inter-agency communication and coordination during disaster recovery events through enhanced reporting capabilities that are available within select systems.

### **4. Efforts to identify duplication use of similar information.**

There is no duplication in information collected as only one IDCM provider will be selected to provide Immediate Disaster Case Management services. ACF IDCM is one alternative available to FEMA for provision of DCM services.

ACF has and continues to coordinate with the American Red Cross, which has in the past, provided services under the FEMA Disaster Case Management Program. There is no duplication in information collected as only one DCM provider will be selected to provide Disaster Case Management services. ACF IDCM is one alternative available to FEMA for provision of DCM services.

**5. Impact of Small Businesses or other small entities.**

Not applicable.

**6. Consequences of collecting the information less frequently.**

The collection of information, both through the paper-based form and electronic method (i.e., ECMRS) will be contingent on IDCM activation following a Presidential declaration of a disaster.

**7. Special circumstances relating to the Guidelines of 5CFR 1320.5.**

Under CFR 1320.5 (general requirements), the request for review by OMB is made for both hardcopy and electronic versions. The technological collection mechanism is the solution that will replace the hardcopy version.

**8. Comments in response to the Federal Register Notice and efforts to consult outside of the agency.**

The information collection effort promotes improvements in service delivery and program management. The information collection, achieved through electronic means, improves collection and output of key metrics related to the specific disaster that will assist federal and State/Tribe/Territory partners in both the response and recovery phases. For example, aggregate data on medium household income may provide crucial information for State/Tribe/Territory stakeholders to make decisions on allocation of services. Additionally, the centralization of the data enhances oversight and quality assurance processes and how the data is reported to interagency partners, namely FEMA. Programmatically, it will also assist ACF to utilize its human services expertise to suggest improvements for planning future response and recovery operations.

Following Hurricane Irene and Super Storm Sandy, ACF has determined the need to make programmatic improvements to build a greater response capacity that included an electronic information collection platform. More specifically, ACF provided and followed the recommendation that a “form be specifically designed to advance direct service, inform reports for interagency partners, and achieve interoperability with information requirements for the DCM State Grant phase identified in the FEMA DCM Program Guidance.” Therefore, the

Electronic Case Management System, which contains the intake assessment and reporting features, is being developed. The assigned OMB Control Number 0970-NEW is correct. This is the first federally owned information system for the Immediate Disaster Case Management program.

**9. Explain any decision to provide any payment or gift to respondents.**

No payments or gifts will be provided to respondents.

**10. Assurance of confidentiality provided to respondents.**

Data collected will be kept confidential. Staff collecting the information will undergo training on privacy and confidentiality.

Hard copies of the information collected through paper based method will be stored under lock and key. If ongoing case management services are offered by the State, Tribe, or Territory after the termination of the Immediate Disaster Case Management program, all files will be transferred to a single point of contact within the State.

ACF's OHSEPR is following all regulatory requirements to collect and store confidential data electronically to include FedRAMP certification with Authorization to Operate approval. ACF will store the data with ongoing intrusion detection monitoring processes.

**11. Justification for sensitive questions.**

Questions sensitive in nature will not be collected.

**12. Estimates of annualized burden hours and costs.**

The estimate is based on a single disaster per year. The estimate is for disaster case managers to go through all applicable questions with the client. Depending on the type of disaster or client needs all questions may not be applicable; therefore the burden hours may be shorter. For disaster case managers working with a large household with multiple needs, the burden hours may be longer. The number of respondents may be lower or higher based on the size of the disaster area and severity. Participation in the IDCM program is voluntary.

The number of disasters that would warrant data collection is estimated at one per year. Due to the unpredictable nature of disasters, the number of respondents is estimated at approximately 3,500. For example, there were 2,200 intake assessments completed in 2011 following Hurricane Irene and Tropical Storm Lee. There were 4,100 intake assessments completed following Super Storm Sandy in 2012. Participation in information collection is voluntary and

based on acceptance of Immediate Disaster Case Management services. The information collection effort commences upon activation of the IDCM following a Presidential major disaster declaration.

Annual Burden Estimates

<b>Instrument</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Burden Hours per Response</b>	<b>Total Burden Hours</b>
IDCM Intake Assessment	3,500	1	40 Minutes	140,000 Minutes

**13. Estimates of other total annual cost burden to respondents and record keepers.**

There is no annual cost burden to respondents.

**14. Annualized cost to the government.**

\*Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Annualized costs to the Federal government

<b>System/ Technology Acquisition</b>	<b>Maintenance Costs per Year</b>	<b>Storage Costs per Year</b>	<b>Total Cost for First Operational Year</b>	<b>Estimated Total Cost (Subsequent Years)</b>	<b>Estimated Cost per Disaster (Contract Staff)</b>	<b>Estimated Cost per Disaster (Federal Staff)</b>
\$65,500	\$18,000	Approximately \$15,000	\$80,500	\$33,000	*\$56,105	**\$7,137

The annualized cost to the Federal Government for the first year should the ECRMS be fully deployed and implemented is \$143,742. The annualized cost to the Government in subsequent years is \$96,212. Of note, the collection of information, both through the paper-based form and electronic method (i.e., ECRMS) will be contingent on activation following a Presidential declaration of a disaster. A Presidentially declared disaster and the activation of IDCM program cannot be predicted given the unpredictable nature of disasters. For the purpose of this request, all estimates are based on one disaster per year. It is however important to note that there may be none, one, or more than one disasters per year that rise to the IDCM program level.

\*The average wage of the contract staff completing the intake assessment is estimated at \$24.04 per hour (\$16.03 rate for 40 minute intake x 3,500 intakes) for a total of \$51,105. Monetary costs associated with information collection requirement for the IDCM program are the salaries of contract staff performing the duties for the cost of \$7,137. Costs are assumed by

the Federal Government through the provision of FEMA funding to states, federally recognized tribes, and U.S. territories after a Presidential major disaster declaration where Individual Assistance has been authorized.

\*\*The average wage for Federal government staff running reports is estimated at \$39.65 per hour (GS12 rate of \$39.65 x 180 hours). Federal staff's work is based on GS-12 position to retrieve and report data generated by the ECMRS. IDCM can be active for up to 180 days from date of a disaster declaration. The maximum number of active operational days (i.e., 180) was used to estimate the total cost per disaster.

**15. Explanation for program changes or adjustments.**

Not applicable. This is a new request.

**16. Plans for tabulation and publication and project time schedule.**

The data will be published, in aggregate only and without identifiable information, for programmatic improvement processes within the state and federal government systems. Performance and outcome metrics such as number of clients served, progression of case management activities, types of referrals made will be generated in the form of a weekly report. All data will be generated by the ECRMS system.

**17. Reason(s) display of OMB expiration date is inappropriate.**

Not applicable. OMB expiration date can be displayed.

**18. Exceptions to Certification for Paperwork Reduction Act submissions.**

Not applicable.

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

**1. Respondent universe and sampling methods.**

Not applicable.

**2. Procedures for the collection of information:**

Not applicable.

**3. Methods to maximize response rates and deal with nonresponse.**

OMB Clearance Package  
Office of Human Services Emergency Preparedness and Response

Not applicable.

**4. Test of procedures or methods to be undertaken.**

Not applicable.

**5. Individuals consulted on statistical aspects and individuals collecting and/or analyzing data.**

Not applicable.