

## THE SUPPORTING STATEMENT

### Request for Voluntary Generic Information Collection

**Terms of Clearance:** This generic clearance for ACF is approved for 3 years under the following conditions: (1) For the team "surveys," ACF shall submit a generic IC in ROCIS along with a short descriptive memo explaining the request. (2) OMB will respond with clearance or questions within 10 working days (or quicker if desk officer is alerted to an urgent disaster or public health emergency need).

#### A. Justification

##### 1. Circumstance which make the data collection necessary

The Administration for Children and Families (ACF) oversees more than 60 programs that affect the normal day to day operations of families, children, individuals and communities in the United States. Many of these programs encourage grantees or state administrators to develop emergency preparedness plans, but do not have statutory authority to require these plans be in place. ACF facilitates the inclusion of emergency preparedness planning and training efforts for ACF programs.

Combinations of the following laws enable ACF to utilize these disaster information collection forms:

- Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288)<sup>1</sup> to fulfill disaster response and recovery efforts as mission assigned by the Federal Emergency Management Agency (FEMA)
- Pandemic and All-Hazards Preparedness Reauthorization Act<sup>2</sup> (Public Law 113-5) in order to coordinate with the HHS Assistant Secretary for Preparedness and Response (ASPR) in order for HHS leadership to make decisions in response and recovery for impacted families.
- Post-Katrina Emergency Management Reform Act (PKEMRA)<sup>3</sup> of 2006 (Public Law 109-295) for ACF to provide human services support to fulfill disaster response and recovery requirements for ACF programs.

---

<sup>1</sup> U.S. Department of Homeland Security. Robert T. Stafford Act Disaster Relief and Emergency Assistance Act. DHS c2013. [Cited 2016 February 23]. Available from: <https://www.fema.gov/robert-t-stafford-disaster-relief-and-emergency-assistance-act-public-law-93-288-amended>

<sup>2</sup> U.S. Department of Health and Human Services. Pandemic and All-Hazards Preparedness Reauthorization Act. DHHS c2013. [Cited 2016 February 23]. Available from: <http://www.phe.gov/Preparedness/legal/pahpa/Pages/pahpra.aspx>

<sup>3</sup> Post Katrina Emergency Management Reform Act of 2006. Congress; c2006. [cited 2016 February 23] Available from: <https://www.congress.gov/bill/109th-congress/senate-bill/3721>

Presidential Policy Directive-8 (PPD-8)<sup>4</sup> provides federal guidance and planning procedures under established phases – protection, preparedness, response, recovery, and mitigation. The Disaster Information Collection Forms addressed in this clearance process provide assessment of ACF programs in disaster response, and recovery.

ACF/Office of Human Services Emergency Preparedness and Response (OHSEPR) has a requirement under PPD-8, the National Response Framework<sup>5</sup>, and the National Disaster Recovery Framework<sup>6</sup> to report disaster impacts to ACF-supported human services programs to the HHS Secretary's Operation Center (SOC) and interagency partners. ACF/OHSEPR works in partnership with the Assistant Secretary for Preparedness and Response (ASPR), and the Federal Emergency Management Agency (FEMA) to report assessments of disaster impacted ACF programs and the status of continuity of services and recovery.

Many disasters are unpredictable and come without notice, and the completion of the Disaster Information Collection Forms is important for ACF to assess that programmatic needs are met during and after a disaster. The roles of the offices are as follows:

ACF/OHSEPR: Once a disaster strikes, ACF/OHSEPR reaches out to ACF programs to determine any impacts to a programs normal operations. Once the forms are released to ACF programs, then the data gathered will be utilized for impact assessment and to fulfill a reporting requirement to ACF leadership and programs, emergency management agencies and partners.

ACF Programs: The ACF programs will reach out to the grantees and/or state administrators to complete the Disaster Information Collection Forms, with the support of ACF regional emergency management specialists. The ACF program staff will gather the data and forward to ACF/OHSEPR so that the assessment information can be analyzed and reported to ACF leadership and programs, the HHS SOC, and FEMA.

---

<sup>4</sup> U.S. Department of Homeland Security. Presidential Policy Directive / PPD-8: National Preparedness. DHS; c2011 [cited 2016 February 23]. Available from: <https://www.dhs.gov/presidential-policy-directive-8-national-preparedness>

<sup>5</sup> U.S. Department of Homeland Security. National Response Framework. DHS; c2013 [cited 2016 February 23]. Available from: <http://www.fema.gov/national-response-framework>

<sup>6</sup> U.S. Department of Homeland Security. National Disaster Recovery Framework. DHS; c2015 [cited 2016 February 23]. Available from: <http://www.fema.gov/national-disaster-recovery-framework>.

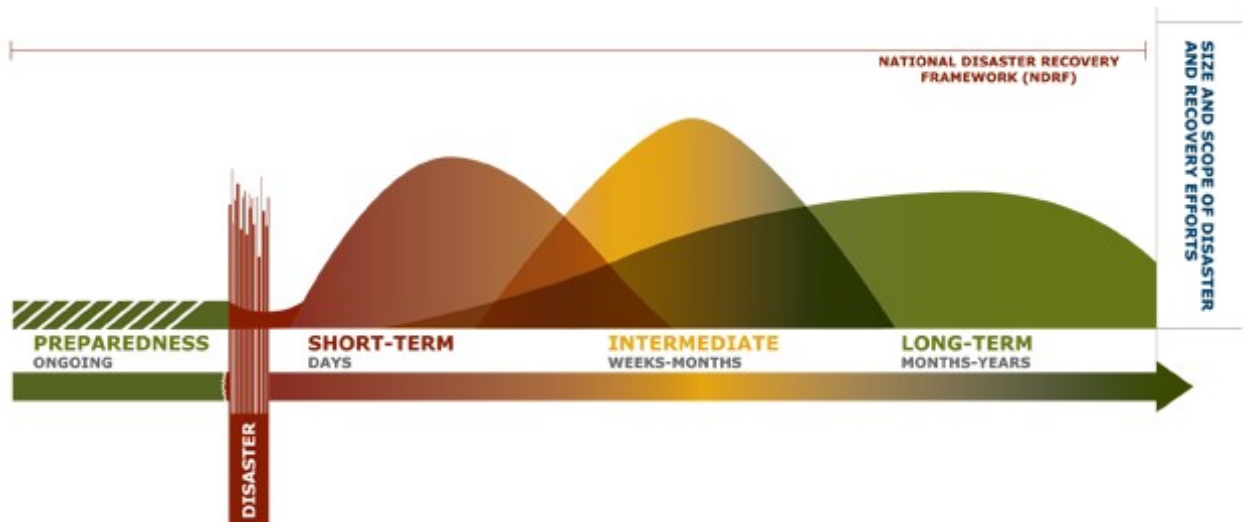
It is the responsibility of ACF programs and OHSEPR to assess, identify gaps, and facilitate recovery that promotes the continuity of ACF human services programs provided to the people we serve.

ACF programs are at heightened risk after a disaster, they serve vulnerable individuals, children, and families. During Superstorm Sandy, five ACF regions were impacted. At the peak of the storm recovery, 697 child care providers, and 86 Head Start centers were impacted in New York, New Jersey, and Connecticut alone. This kind of information is imperative for ACF/OHSEPR to facilitate support, and technical assistance from the ACF programs that are impacted by the storm.

These Disaster Information Collection Forms will be used before, during, and after a disaster, both natural (e.g., tornado, earthquake, hurricane) and man-made (e.g., chemical spill, water contamination) disasters. Disasters destroy homes; damage local infrastructure and disrupt children, individuals, and families operations. Disasters interrupt services and social support networks, thus negatively affecting community well-being.

The recovery phase of a disaster involves moving the community back towards normal functioning. Recovery is immediate and overlaps with response. It includes actions such as providing essential public health and human services operations.<sup>7</sup>

Figure A.1.1. The Recovery Continuum



## 2. Purpose and Use of the Information Collection

<sup>7</sup> U.S. Department of Homeland Security. National Response Framework. DHS; c2013 [cited 2016 February 23]. Available from: <http://www.fema.gov/national-response-framework>

The assessment information collected in the Disaster Information Collection Forms on ACF program impacts will be used to provide real time updates during the response and recovery phases of a disaster. The information collected will be on programs within the disaster-affected area, and neighboring areas.

The Disaster Information Collection Forms will be a key source of information on ACF program impact. The assessment will provide information to respond to inquiries about ACF human services response and recovery efforts, specifically for children and families that need the support of ACF programs following a disaster. The collected data will help the ACF programs provide technical assistance and impact-specific subject matter expertise to the State and the impacted grantees.

The assessment that is received from the ACF programs (discretionary and mandatory), grantees, and/or state administrators is reported to the ACF Assistant Secretary and leadership. The Disaster Information Collection Form assessment also serves as a reporting requirement for ACF/OHSEPR. The analysis is shared, as appropriate, with the White House via the FEMA-produced Senior Leadership Brief.

The Disaster Information Collection Forms will be requested by Regional (if applicable) or Central Office ACF program staff to the ACF grantees or state administrators. The grantees or administrators will submit the information to the ACF program staff. ACF program staff will work with ACF/OHSEPR to compile the data and provide a synopsis for analysis of programmatic impacts for ACF senior leadership and interagency partners.

During response sample questions could be: is the program office able to continue operations? Has the service facility been affected by the storm or disaster? Has there been in interruption in services, e.g., child care slots lost, family violence shelter accessible?

During recovery sample questions could be: if the program was impacted, what is the timeline for reopening? Have individuals, children, and families continued receiving services provided by your program without disruption?

The information gathered in these data collection forms will be used to assess the response and recovery gaps of ACF programs 30 days to one (1) year post disaster.

### **3. Use of Improved Information Technology and Burden Reduction**

The Disaster Information Collection Form will be submitted through a central web-based application to allow for centralization of information and process-oriented workflows that enhance the response and recovery efforts of the federal government.

If the impacted grantees/administrators are unable to access a computer due to damages from a disaster, ACF Program staff will work with the grantees/administrators to enter the data into the tools.

#### **4. Efforts to Identify Duplication and Use of Similar Information**

No similar information is available.

#### **5. Impact on Small Businesses or Other Small Entities**

Not applicable. Small businesses and small entities are not impacted.

#### **6. Consequences of Collecting the Information Less Frequently**

While disasters are in many respects unpredictable ACF/OHSEPR provides ACF-wide Advisory Reports and Situation Reports on the status and impact of disasters. These reports are also shared at the departmental level.

It is imperative that we are able to collect specific information regarding the impacts of ACF programs immediately after an event to ensure that ACF is providing a strategic and timely response to meet the needs of individuals, children, families, local grantees, implementing agencies, and the surrounding communities.

Real-time impact information on the disaster is vital for recovery, and future planning efforts for ACF programs.

#### **7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

The information requested is needed immediately following a disaster and will ensure that emergency responders have a mechanism in place to guide their strategic response and recovery efforts. The collection of information will fall within the 30 day response timeframe because the information gathered in this data collection will be used to support a coordinated response during the initial outreach stage when emergency response personnel and federal government resources may be conducting damage assessments to aid recovery efforts in the impacted disaster zones.

**8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

ACF published a 60 day notice for public comment in the FEDERAL REGISTER of 7/31/2015 (FR Doc. 2015-18711). No comments were received.<sup>8</sup>

**9. Explanation of Any Payment or Gift to Respondents**

Not applicable

**10. Assurance of Confidentiality Provided to Respondents**

Not applicable

**11. Justification for Sensitive Questions**

Not applicable

**12. Estimates of Annualized Burden Hours and Costs**

The burden cap for the Disaster Information Collection Form is estimated based on a single disaster per year. The estimate is for approximately 10 state administrators, or grantees to go through all of the applicable questions with the Regional and Central Office staff. Some ACF programs have more questions and may have more respondents.

<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>
Disaster Information Collection Form	10	15	0.08 hours (5 minutes)	12 hours (720 minutes)

An estimate of the number of disasters that would warrant data collection is difficult to calculate due to the unpredictable nature of disasters. For example, in 2012, there were 95 disasters nationwide but OHSEPR did not collect data on all of them because they had minimal effects on ACF programs.

**13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers**

Not applicable.

**14. Annualized Cost to the Federal Government**

<sup>8</sup> <https://www.gpo.gov/fdsys/pkg/FR-2015-07-31/html/2015-18711.htm>

Federal staff costs are contingent on disaster frequency. In the event of a disaster federal staff costs are estimated to be 20% of the time (8 hours out of 40 per week) of a Program Specialist (GS-12) to oversee the data collection, respond to inquiries, and aggregate the data. Estimating that the disaster information collection will last approximately six months (24 weeks) at this rate.

GS-12 rate of \$39.65x8 hoursx24 weeks = \$7,612.80 (total estimated cost)

**15. Explanation for Program Changes or Adjustments**

This is a new project.

**16. Plans for Tabulation and Publication and Project Time Schedule**

In an effort to ensure proper guidelines were followed and to learn how to better respond to future disasters an After Action Report is drafted 60 days after the emergency response, support, and recovery efforts are completed. This report is an ACF-wide endeavor that outlines ways we can better help individuals, children, and families of the nation.

**17. Reason(s) Display of OMB Expiration Date is Inappropriate**

Not applicable.

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

Not applicable. No statistical methods of analysis of the Disaster Information Collection Form are proposed.