

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) will improve the intake process and delivery of case management services to individuals and households impacted by a disaster.

2. Purpose and use of the information collection.

The recent climatic events of Hurricane Harvey and Hurricane Irma have created catastrophic disasters in Texas, Louisiana, Puerto Rico, U.S. Virgin Islands, and Florida. President Trump has declared these climatic events as major disaster declarations. FEMA is providing assistances to these states and territories under declaration numbers DR-4332 & DR-4337.

There are looming public health issues related to flooding, and especially among at risk populations. Risks include contracting water-borne and vector-borne diseases, substance abuse, and mental health concerns, including PTSD, depression, anxiety, and homelessness.

Therefore, it is essential for the mission of ACF to activate the Immediate Disaster Case Management (IDCM) Electronic Case Management Record System (ECMRS). The ECMRS will be used to collect and manage information from the disaster affected clients. The primary purpose of the information collection is to support ACF/OHSEPR's goal of quickly identifying critical gaps, resources, needs, and services to support State, local and non-profit capacity for disaster case management after a major disaster. Information provided by individuals impacted by disasters will be collected by BCFS Health and Human Services, contract support for ACF/OHSEPR, under Contract HHSP233201400031I.

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.

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 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 disaster 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.

No duplication exists as collection is contingent on mission activation following a Presidential declaration of a disaster.

5. Impact of Small Businesses or other small entities.

Not applicable.

6. Consequences of collecting the information less frequently.

The collection of information will be contingent on 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 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.

This is a new collection request (OMB-0970-0401). Coordination and consultation with the Federal Emergency Management Agency which activates ACF's IDCM program have been

conducted. The American Red Cross, which provides human services case management services, is consulted for content.

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.

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

Instrument	Number of Respondents	Number of Responses per	Burden Hours per Response	Total Burden Hours
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		Respondent		
IDCM Intake Assessment	3,500	1	1 Hour	3,500 Hours

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

System Program Management	Operations and Maintenance Costs per Year	Estimated Cost per Disaster (Contract Staff)	Estimated Cost per Disaster (Federal Staff)
\$165,500	\$18,000	*\$51,105	**\$7,137

The annualized cost to the Government for the first year should the ECRMS be fully deployed and implemented is \$183,500. Of note, the collection of information 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 estimated that upon the IDCM Program being activated, the total cost of operating the ECMRS will be \$58,236.

*The average wage of the contract staff completing the intake assessment is estimated at \$24.04 per hour (\$16.03 rate for 60 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.

The IDCM assessment has undergone minor formatting changes and some of the questions have been updated to improve the intake process.

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.

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.