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 to 10 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.

Type of Respondent	Form Name <i>l</i> 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/ISP Final Report Narrative, (Immediate Services Program) / No Form #	15	1	15	8 hours	120	55.76	\$6,691

	CCP/RSP							
State, local or Tribal Government	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	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.

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	
Standard Form 424		15	+15				
Standard Form 424A		15	+15				
Standard Form 425		15	+15				
Project Performance Site Location Form Standard HHS Checklist		15	+15				
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;
 - o fewer questions being asked limited questions to what is required by the regulations and eliminated extraneous questions;
 - o reduced redundancy by eliminating duplicative questions;
 - o reduced and removed some instructions and placed those in guidance instead of on the form itself; and
 - o 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.