

September 15, 2017

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0142

Title: Survivor Sheltering Assessment

Form Number(s): FEMA Form 009-0-42

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 Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended, is the legal basis for FEMA to provide financial assistance and services to individuals who apply for disaster assistance benefits in the event of a federally-declared disaster. 44 C.F.R. § 206.110 implements the policy and procedures set forth in section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5174, as amended by the Disaster Mitigation Act of 2000. This program provides financial assistance and, if necessary, direct assistance to eligible individuals and households who, as a direct result of a major disaster or emergency, have uninsured or under-insured necessary expenses and serious needs and are unable to meet such

expenses or needs through other means. Individuals and households that apply for this assistance must provide information detailing their losses and need.

FEMA requires the ability to collect information regarding the housing needs of survivors in shelters to provide services and assistance to transition them out of shelters and into temporary housing solutions as quickly as possible. Survivor-specific data collected in the shelters would be compared to survivor registration data to determine:

- Has the survivor in the shelter registered for FEMA assistance?
- If registered, what is the status of the survivor's registration? Do they have resources such as Transitional Sheltering Assistance (TSA) eligibility or financial rental assistance, available to them?
- If registered and not eligible for FEMA assistance, is there casework that could be performed to find eligibility?
- If not registered, information would be provided to the Joint Field Office (JFO) to have a registration strike team travel to the shelter and register the survivor.

Aggregated reports resulting from the individualized data collection will support JFO planning activities for shelter depopulation to ensure that survivors are transitioned as quickly as possible to housing solutions that best meet their need.

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.

FEMA Form 009-0-42, Survivor Sheltering Assessment - When a federally declared disaster or emergency occurs, impacted survivors often find themselves temporarily housed in shelters until they are able to return to their homes or find other housing solutions while they recover. A FEMA employee will interview individual survivors located in shelters regarding their registration status and housing situation using an electronic copy of **FEMA Form 009-0-42 Survivor Sheltering Assessment** to record the information in the Disaster Management Support Environment Cloud Environment (DMSE CE) database. The purpose of this survey is to help FEMA understand how best it can support survivors as they transition out of temporary shelters. No information given will be used to determine eligibility for assistance. Eligibility for assistance will only be determined through the separate registration process.

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.

The survivor sheltering assessment process is completed by FEMA employees using an electronic copy of **FEMA Form 009-0-42 Survivor Sheltering Assessment** from their FEMA-issued mobile device. The electronic form is configured using a survey application. The FEMA employee must download the application to their mobile device and be provided access to the electronic **FEMA Form 009-0-42** in order to save the blank survey form to their device. During the interview, the FEMA employee records information on the electronic form and submits upon completion. This process is repeated for each interview. Once the submission of the individualized collection to the DMSE CE database is complete, the collection information is wiped from the phone, rendering it inaccessible to the FEMA employee(s) conducting the interview.

The survey application was chosen to minimize the training time for FEMA staff, speed collection by the use of closed response options and limiting open text fields, and provide a secure mechanism to collect, transmit, store and report on survivor sheltering information. Additionally, the product enables FEMA to collect in limited or no-connectivity environments. Alternative solutions, like the use of password-protected spreadsheets and email, required significant manual interaction to centralize information and did not provide adequate protections for personally identifiable information (PII).

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 majority of the information collected in this form is not collected under any other approved collection. Non-sensitive PII (Registration ID, Name, Address, Mobile Phone number and Owner/Renter) included in this form is collected on the other FEMA Forms (see below), but neither form is accessible to the staff conducting the survey. Further, at times, the forms have not been collected because the survivor did not register for assistance prior to being interviewed.

- FEMA Form 009-0-1T (English) Tele-Registration, Disaster Assistance Registration
- FEMA Form 009-0-1Int (English) Internet, Disaster Assistance Registration
- FEMA Form 009-0-2Int (Spanish) Internet, Registro Para Asistencia De Desastre
- FEMA Form 009-0-1 (English), Paper Application / Disaster Assistance Registration
- FEMA Form 009-0-2 (Spanish), Solicitud en Papel / Registro Para Asistencia De Desastre

- FEMA Form 009-0-1S (English) Smartphone, Disaster Assistance Registration
- FEMA Form 009-0-2S (Spanish) Smartphone, Registro Para Asistencia De Desastre

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.

Not applicable. The information collected is specific to individuals and does not impact 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 is only collected when the President has declared a major or emergency disaster that has affected individuals and households. To fulfill the mandates of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, and provide disaster survivors with appropriate housing or rental assistance,, FEMA must collect information on individual housing needs. Without collecting this information, FEMA would not be able to gauge survivors' needs to transition them out of temporary shelters.

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.
- (b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.
- (c) Requiring respondents 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.
- (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.
- (f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.
- (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.

(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.

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

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 November 22, 2017, 82 FR 55622.

No comments were received.

A 30-day Federal Register Notice inviting public comments was published on February 1, 2018, 83 FR 4670.

No comments were received.

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 frequently works with persons outside of the agency, who serve in a partnership role to provide financial assistance or other forms of assistance to survivors. The information included in this collection is not currently available through other partners, or if it is, it is not covered under existing information sharing agreements.

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.

Under Executive Order 12862, Federal Agencies are to develop a customer service orientation for use in the implementation of their programs. In accordance with Executive Order 12862, FEMA reviews customer service performance and provides customer service feedback through the Disaster Assistance Customer Satisfaction Survey. The data collection for this survey is approved under OMB Control Number 1660-0036, *FEMA Public Assistance Program Evaluation and Customer Satisfaction Surveys and Individual Assistance Customer Satisfaction Surveys*.

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.

The Survivor Sheltering Assessment is a privacy sensitive collection requiring Privacy Impact Assessment, PIA coverage. This form is covered by an existing PIA, DHS/FEMA/PIA-027 National Emergency Management Information System; DHS/FEMA/PIA-012a Disaster Assistance Improvement Plan (DAIP). The SORN coverage is DHS/FEMA-008 Disaster Recovery Assistance Files April 30, 2013, 78 FR 25282.

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 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.

FEMA anticipates surveying approximately 31,200 individuals using **FEMA Form 009-0-42 Survivor Sheltering Assessment** during a catastrophic event. While this number may seem low compared to the total sheltering population during a catastrophic event, FEMA will not be conducting a 100 percent coverage survey; instead, FEMA will survey a sample of the total sheltering population.

Because many survivors reside in shelters during a catastrophic event because of mandatory evacuations, not because of damage to their homes, this survey generally will begin after the “natural” depopulation of the shelters is underway (i.e. after the mandatory evacuation order is lifted and survivors who can are returning to their homes.) The survey data gathered through **FEMA Form 009-0-42**, is intended to help FEMA frame the shelter depopulation strategy to determine what issues are impeding the remaining survivors from returning home.

FEMA’s survey sample size for catastrophic events is estimated to be 31,200, which is based on sheltering data from previous catastrophic events. FEMA estimates that it takes approximately 10 minutes to complete a survey resulting in a total annual hour burden for the collection process of 5,201 hours.

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.

Not applicable. This request does not cover more than one form.

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 1.46 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.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	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
Individuals or Households	Survivor Sheltering Assessment - FEMA Form 009-0-42	31,200	1	31,200	0.1667 (10 mins.)	5,201	\$34.84	\$181,203

- Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (BLS)¹ the wage rate category for All Occupations is estimated to be \$23.86 per hour, which is multiplied by a wage rate multiplier of 1.46^{2 3} to calculate a fully-loaded wage rate of \$34.84 per hour ($\$23.86 \times 1.46 = \34.84). Therefore, the estimated cost to respondents is \$181,203 annually and the total estimated burden is 5,201 hours.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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:

¹ May 2016 National Occupational Employment and Wage Rates, National File (xls), All Occupations (OCC Code: 00-0000, Average, Column Title: H_Mean). Accessed and downloaded September 13, 2017. <https://www.bls.gov/oes/tables.htm>

² Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, June 2017. Accessed and downloaded September 13, 2017. https://www.bls.gov/news.release/archives/ecec_09082017.htm

³ The per hour benefits multiplier is calculated by dividing total compensation for all workers (\$35.28, September 8, 2017) by wages and salaries for all workers (\$24.10, September 8, 2017), which yields a per hour benefits multiplier. For September 8, 2017, the multiplier is 1.46. ($\$35.28 \div \$24.10 = 1.463900$). Fully-loaded wage rates are calculated by multiplying the per hour benefits multiplier by the applicable wage rate from the applicable National Occupational Employment and Wage Rates report. (1.46 per hour benefits multiplier x hourly wage rate = fully-loaded hourly wage)

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 to respondents or recordkeepers 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.

There are no additional annual costs to the federal government for this collection above the cost and hours of burden identified in Question 12.c. Electronic tools that will be used to complete this collection are already purchased and supported within FEMA and require no additional cost above what is already included in an approved program baseline.

Annual Cost to the Federal Government	Cost (\$)
Contract Costs	\$60,000
Staff Salaries [25 GS 9, step 3 employees in Washington DC spending approximately 10% of their time (208 hours) annually to collect data/survey individuals for this data collection. The 2017 hourly rate for a GS 9 step 3 employee in Washington DC is \$28.10 per hour which when multiplied by a load factor of 1.46 to account for benefits equals \$41.03 per hour. Total staff salaries equals \$213,356 (25 employees x 208 hours/year x \$41.03 = \$213,356)]	\$213,356
Facilities [Cost of renting, overhead, etc., for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment and 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	\$0

Total	\$273,356
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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.

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
Survivor Sheltering Assessment - FEMA Form 009-0-42	0	5,200		0	5,200	5,200
Total(s)	0	5,200			5,200	5,200

Explain:

For the Survivor Sheltering Assessment collection, the previously approved burden hours were 0 as this is a new collection and the current estimated annual hour burden is 5,201 hours. Therefore, the burden hours are positive program changes.

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.**

There is not statistical methodology involved in this collection.