



FEMA

MEMORANDUM FOR: The Honorable Neomi Rao
Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Stephen Rice
Deputy Chief Information Officer *Stephen Rice*
Department of Homeland Security

FROM: Eric M. Leckey
Chief Administrative Officer (Acting) *Eric M. Leckey*
Mission Support
DHS Federal Emergency Management Agency

SUBJECT: Emergency Approval Request of Revisions to Office of Management
and Budget (OMB) Collection 1660-0002 Disaster Assistance
Registration

The Federal Emergency Management Agency (FEMA) seeks emergency approval for the revision to OMB Collection 1660-0002 Disaster Assistance Registration. It is vital that the revisions to the currently-approved information collection be implemented as soon as possible because of upcoming potential disaster declarations. In accordance with the Paperwork Reduction Act (PRA) and the OMB implementing regulations at 5 C.F.R. § 1320.13: (1) this information is necessary to the mission of the agency, (2) this information is necessary prior to the normal timeframes established under the PRA, (3) public harm is reasonably likely to result if normal clearance procedures are followed, and (4) unanticipated events are likely to occur.

FEMA requests approval to revise OMB Collection 1660-0002 Disaster Assistance Registration in the following manner:

- Addition of applicant self-assessment questions
- Addition of identity-proofing questions

Mission Essential Information

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288) (the Stafford Act), as amended, is the legal basis for FEMA to provide disaster-related financial assistance and services to individuals who apply for disaster assistance benefits in the event of a federally-declared disaster. Regulations in title 44 of the Code of Federal Regulations (CFR), Subpart D, "Federal Assistance to Individuals and Households," implement the policy and procedures set forth in section 408 of the Stafford Act, 42 U.S.C. 5174, as amended. 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 damage, necessary expenses, and serious needs which are not covered through other means. The “Other Needs Assistance” (ONA) provision of Individuals and Households Program (IHP) provides financial assistance to address disaster related medical, dental, funeral, child care, personal property, transportation, and other necessary expenses or serious needs resulting from a major disaster.

When a presidential federally-declared disaster or emergency occurs, disaster survivors can register for assistance using one of the following instruments:

- **FEMA Form 009-0-1Int (English) or 009-0-2Int (Spanish)** – allows disaster survivors to apply for assistance by accessing the forms through www.Disaster.Assistance.gov. Disaster survivors have the option to use the mobile site to apply using their smartphones and accessing **FEMA Form 009-0-1S (English) or 009-0-2S (Spanish)**.
- **FEMA Form 009-0-1T** – disaster survivors can call FEMA’s 1-800 number to apply for disaster assistance. A FEMA Human Service Representative will interview individuals over the telephone.
- **FEMA Form 009-0-1 (English) and 009-0-2 (Spanish)** – is the paper version of the disaster assistance registration form. This is only used in rare circumstances when FEMA’s registration system is not accessible or when phone lines are down.

The information collected from one of the above instruments is electronically transferred to FEMA’s official system of record, the National Emergency Management Information System (NEMIS), so the data can be stored and processed.

Applicant Self-Assessment Questions: During the 2017 hurricane season, FEMA declared nine major disasters with 4,737,068 survivors registered for FEMA assistance resulting in the need for various types of damage assessments. Once disaster survivors register for assistance, FEMA is required to verify losses to determine their eligibility for IHP assistance. Typically, FEMA’s standard loss verification method for initial eligibility determinations for IHP is an onsite inspection performed by a FEMA inspector. At the time, declarations for DR-4335/4340-U.S. Virgin Islands, DR-4336/4339-Puerto Rico, DR-4337-Florida, and DR-4338-Georgia were projecting an anticipated total of 1.46 million additional inspections. In addition, thousands of inspections were still pending because of the aftermath of Hurricane Harvey and the estimated wait time for onsite inspections was more than thirty-five days, whereas the inspection wait time is generally about 7-10 days. Ultimately, FEMA performed over 2,491,199 inspections during the 2017 hurricane season.

In order to effectively address the needs of applicants affected by multiple back-to-back disaster declarations, IHP expedited the delivery of assistance by modifying the inspection process. FEMA implemented self-assessment phone interviews for Hurricane Irma disaster survivors within the continental United States. FEMA contacted applicants and allowed them to respond to a series of questions which ultimately led FEMA to a damage level based on their responses. Based on the information provided by disaster survivors, FEMA was able to provide some financial assistance and/or triage homes for inspection.

Building on the success of this 2017 initiative, FEMA intends to incorporate damage self-assessment questions to the Registration Intake process. The information from the self-assessment questions will provide the ability to direct resources to disaster survivors with a critical need for assistance. It is also important to note that although not directly related to critical disaster survivor needs, if this functionality was available during the 2017 hurricanes it would have resulted in a reduction of approximately \$150M in administrative costs. Additionally, disaster survivors would have waited approximately 22 fewer days for their in-person inspection.

The National Oceanic and Atmospheric Administration is tracking several Atlantic disturbances. The first is Hurricane Florence which is forecasted to strengthen to a hurricane and threaten the east coast. Two additional disturbances are closely following Florence; Invest 92L and Invest 93L). In addition, there is Hurricane Oliva (CAT 3) 1500 miles east of Hawaii and a Tropical Cyclone bearing down on Guam.

The specific risks to human life, safety, or health posed by the disturbances include:

- Direct damage by wind resulting in injury and disruption of transportation, utilities, and medical care.
- Torrential rain, flash floods, tidal surge, and major flooding directly threatening occupied dwellings and critical safety-related infrastructure.
- Landslides threatening occupant safety and safe transportation of victims and life-sustaining supplies.

Because of the substantial risk to life, safety, or health of individuals displaced by Hurricane Lane and the current Hurricane Florence, FEMA is requesting an Emergency Waiver to incorporate the self-assessment questions into the registration intake process. This information will allow FEMA to better manage its resources and provide assistance to survivors who need it most in a more expedient manner.

Reduce Fraudulent Activity: After the 2017 hurricane season, FEMA was alerted to a large number of potentially illegitimate FEMA registrations. Due to possible identity theft, bad actors were able to complete and submit fraudulent disaster assistance registrations.

Additionally, bad actors created online disaster assistance accounts that were linked to valid registrations. Once the accounts were accessed, critical account information was changed, resulting in improper payments to persons committing the fraud instead of actual disaster survivors.

In order to address and reduce the fraudulent activity, these objectives need to be met:

1. Ensure the person applying for assistance is who they say they are. (Identity Proofing)
 2. Ensure the person creating an online account is the same person that applied for assistance. (Request Email Address)
- Identity Proofing Questions: To address the fraudulent registrations, FEMA will implement identity proofing questions in the registration process. This process will require the applicant to answer four questions to confirm their identity. Answering the

questions correctly will help ensure disaster survivors with critical and immediate needs are helped in a timely manner and payment is made to legitimate disaster survivors.

Paperwork Reduction Act Timeframes

Applicant Self-Assessment Questions: FEMA is applying lessons learned from the historic 2017 hurricane season to streamline survivors' damage verification by diversifying the tools available to assess and validate disaster loss, and developing methods of assessment to prioritize those who require an on-site inspection. Once disaster survivors register for assistance, FEMA is required to verify losses to determine their eligibility for IHP assistance. During a catastrophic event or several large simultaneous disaster declarations, FEMA may be unable to hire and train enough inspectors to accommodate the number of damage assessments required. This has a direct impact on providing necessary assistance to the disaster survivor. Adding the self-assessment questions will allow FEMA to better assess the disaster survivor's needs immediately following the registration process. This will ultimately provide those with the most critical needs and in the most unsafe conditions with assistance first.

Identity Proofing Questions: Following the 2017 hurricane season, FEMA prioritized the need to include fraud prevention elements into the registration intake process prior to the 2018 hurricane season. Implementing automated identity proofing into the registration intake process, FEMA will increase assurance of payment to legitimate disaster survivors, and results in a more timely delivery of funds needed to recover from the disaster.

Email Address Request: While the identity proofing questions described above strengthen the registration intake process, adding the email address for securing account creation will tie the account to the person that submitted the registration even more closely, protecting legitimate survivors from having their assistance redirected to bad actors.

Public Harm is reasonably likely to Result if Normal Clearance Procedures are followed

Applicant Self-Assessment Questions: Public harm is reasonably likely to result without the implementation of the applicant self-assessment questions. The self-assessment functionality provides FEMA the ability to prioritize needs quickly and efficiently. This will result in providing survivors with the most detrimental home damage, living in unsafe environments, assistance first.

As a result of larger volumes of registrations taken in catastrophic events or multiple simultaneous declarations, FEMA inspectors schedule an onsite inspection with the applicant. In a typical or small event this may occur within seven to ten days after the applicant registers for disaster assistance. Declarations for the 2017 hurricane season resulted in over 2,491,199 inspections. Significant disasters and/or multiple events like the ones experienced in the 2017 hurricane season can stretch the capabilities FEMA typically utilizes to perform inspections, thus delaying inspection appointments with disaster survivors from within seven to ten days to more than 30-60 days. This ultimately significantly delayed the provision of FEMA assistance to those with the most detrimental home damage.

Current models are showing that Hurricane Florence is now a Category 4 Hurricane and will likely strengthen to a Category 5 and provide significant damage to parts of North Carolina, South Carolina and much of Virginia. The ability to triage damage assessments and intelligently manage on ground resources, i.e., mobilizing inspectors on the islands that suffered the most damage and inspecting those with the worst reported losses, will significantly reduce the time to provide assistance to survivors with the greatest need.

Identity Proofing Questions: Public harm is reasonably likely to result if normal clearance procedures are followed as fraudulent registrations will continue to occur without the addition of the identity proofing questions. Bad actors can too easily submit multiple illegitimate registrations, using stolen identities, which can adversely affect survivors who have a critical need for expedited assistance funds. In addition, these bad actors can also breach Equifax or other Personally Identifiable Information to create accounts against legitimate registrations to unlawfully redirect funds. This will prevent assistance from being provided to disaster survivors.

Unanticipated Events

Hurricane season 2018 began on June 1. FEMA is unable to predict when and where natural disasters may occur.

Applicant Self-Assessment Questions: Had applicant self-assessment questions been available during the 2017 hurricane season, survivors would have received their desperately-needed FEMA assistance up to possibly 22 days faster. The information gained through survivors' self-assessments will enable FEMA to triage applicants and reduce the amount of on-site home inspections for survivors with minimal damages. For Hurricanes Harvey, Irma and Maria alone, 56% of homes inspected by FEMA resulted in no assistance to the survivor because of a lack of disaster caused damage. Had the applicant self-assessment questions been part of the registration intake process at that time, FEMA would have been able to withhold unnecessary inspections and prioritize inspection of homes with the more extensive damage.

Identity Proofing Questions: There is not one overarching technical solution that will prevent all illegitimate disaster registrations. However, had identity authentication questions been available during the 2017 hurricane season, bad actors could have been prevented from submitting illegitimate registrations that not only defrauded FEMA of millions of dollars, but also inhibited legitimate survivors from applying for assistance because of the fraudulent activity.

Conclusion

Following the normal clearance procedures for OMB approval to collect housing needs assessments data and add fraud prevention elements to the registration intake process may delay FEMA's ability to comply with the requirements of the law, and provision of assistance to disaster survivors. As discussed, FEMA certifies that the requirements of 5 C.F.R. 1320.13(a) are met and it is vital that this new collection be implemented by July 1, 2018, because: (1) this information is essential to the mission of the Agency, (2) this information is necessary prior to the timeframes established under the PRA, (3) public harm is reasonably likely to result if normal clearance procedures are followed, and (4) unanticipated events are likely to occur.

Thank you for your consideration.