Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0002

Title: Disaster Assistance Registration

Form Number(s):

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

FEMA Form 009-0-3 (English), Declaration and Release FEMA Form 009-0-4 (Spanish), Declaración Y Autorización

FEMA Form 009-0-5 (English), Manufactured Housing Unit Revocable License and Receipt for Government Property

FEMA Form 009-0-6 (Spanish), Las Casas Manufacturadas Unidad Licencia Revocable y Recibo de la Propiedad del Gobierno

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 (Stafford 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. Regulations in title 44 Code of Federal Regulations, Part 206.110, "Federal Assistance to Individuals and Households," implements 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 have necessary expenses and serious needs that are unable to be met through other means. Individuals and households that apply for this assistance must provide information detailing their losses and needs through this information collection.

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.

The information gathered within this collection is used to determine if the individual is in a federally-declared disaster area and whether they have disaster-caused necessary expenses or serious needs that are unable to be met through other means.

FEMA Forms 009-0-1T (English) Tele-Registration - When a federally-declared disaster or emergency occurs, a tele-registration 800 number is published for individuals to call and apply for assistance. A FEMA service representative will interview individuals over the telephone using the questions in this information collection and record the individual's information directly to the electronic copy of FEMA Form 009-0-1T (English) Application/Registration for Disaster Assistance in FEMA's National Emergency Management Information System (NEMIS) database.

FEMA Forms 009-0-1Int (English) and 009-0-2Int (Spanish) Internet - When a federally-declared disaster or emergency occurs, a disaster assistance website is published for individuals to apply for assistance at www.fema.gov. This allows individuals to apply for FEMA assistance using FEMA Form 009-0-1Int (English) or FEMA Form 009-02Int (Spanish). The information collected via the internet is electronically transferred to the NEMIS database.

FEMA Forms 009-0-1 (English) and 009-0-2 (Spanish) Paper - When a federally-declared disaster or emergency occurs, a tele-registration 800 number and disaster assistance website are published for individuals to apply for FEMA assistance. In rare circumstances, when the system is not accessible or when telecommunication capabilities are inoperable, FEMA representatives will record applicant information using the paper versions of FEMA Forms 009-0-1 (English) or 009-0-2 (Spanish). Once completed, the information is entered into NEMIS by the FEMA representative.

FEMA Forms 009-0-1S (English) and 009-0-2S (Spanish) Smartphone - When a federally-declared disaster or emergency occurs, a tele-registration 800 number and disaster assistance website (www.fema.gov) are published for individuals to apply for FEMA assistance. This allows the individual to apply for FEMA assistance using FEMA Form 009-0-1S (English) or FEMA Form 009-02S (Spanish) via the Internet using a personal computer or internet capable mobile device. The information collected is electronically transferred into NEMIS.

FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish) – In order to be eligible to receive FEMA disaster assistance, a member of the household must be a citizen, non-citizen national or qualified alien of the United States. FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish), Declaration and Release form is used to certify respondent's information and eligibility. Information gathered in this collection is currently imbedded within FEMA Form 009-0-1 and is only used in circumstances when FEMA registrations are collected by paper via FEMA Forms 009-0-1 (English) and 009-0-2 (Spanish) Paper.

FEMA Forms 009-0-5 (English) and 009-0-6 (Spanish) - Applicants who qualify for FEMA Direct Temporary Housing Assistance via Manufactured Housing Units (MHU), such as travel trailers, mobile homes, or other fabricated dwellings are required to acknowledge and accept conditions for receiving and occupying government property. Once an applicant is determined eligible for Direct Temporary Housing Assistance, FEMA will use the applicant's information collected in FEMA Form 009-0-1 to prepare the Manufactured Housing Unit Revocable License and Receipt for Government Property document which will permit applicants to use the MHU as temporary housing.

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.

An applicant may register for FEMA's Individuals and Households Program via www.DisasterAssistance.gov through the internet using a personal computer or internet-capable mobile device, by calling FEMA's 800 toll-free number, or through the submission of a paper registration via a FEMA representative. All registration methods are processed through NEMIS in the same manner. NEMIS is an integrated database system used to provide FEMA, states, territories, tribes, and other federal agencies with automation and record storage capabilities to perform disaster and non-disaster operations.

For FEMA Forms 009-0-1T (English), the toll-free 800 number allows respondents to register for assistance over the phone with a FEMA representative.

For FEMA Forms 009-0-1S (English) and 009-0-2S (Spanish), an 800-number and a disaster assistance website is published for individuals to apply for assistance at www.DisasterAssistance.gov or www.fema.gov or via the internet using their mobile device.

For FEMA Forms 009-0-1Int (English) and 009-0-2Int (Spanish), Internet registration for assistance at www.DisasterAssistance.gov allows respondents to apply online electronically.

FEMA Forms 009-0-1 (English) and 009-0-2 (Spanish) allows applicants to register with FEMA using a paper application.

FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish) provides the Declaration and Release Form that can be signed electronically or in paper form.

FEMA Forms 009-0-5 (English) and 009-0-6 (Spanish) are not applicable to this question as these forms are not currently available online or electronically.

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.

This information is not collected in any other form, and therefore is not duplicated elsewhere.

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.

NEMIS is designed in such a way that any small business owners attempting to apply for FEMA Individuals and Households Program (IHP) assistance are automatically referred to the Small Business Administration (SBA) for disaster assistance.

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 from this collection is gathered only when the President has declared a major disaster or emergency for FEMA Individual Assistance. In order to provide disaster assistance to individuals and households within a presidentially-declared area, applicant information must first be collected to validate their claims with the applicable Federal program requirements.

- 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 September 27, 2018, 83 FR 48855. **No comments were received.**

A 30-day Federal Register Notice inviting public comments was published on December 13, 2018, 83 FR 64141. **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 facilitate our assistance or to provide other forms of assistance to disaster survivors. The following are several key external partners and their role in this process:

The U.S. Department of the Treasury uses applicant address and social security information, obtained as part of the collection, to award financial assistance by way of a paper check or by an Electronic Funds Transfer (EFT).

FEMA collaborates with the SBA in determining applicant eligibility for some types of IHP Other Needs Assistance. Applicant information is shared with the SBA for loan consideration based on income, insurance and applicant need.

- 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.
- 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.

This collection is supported by the existing System of Records Notice (SORN): DHS/FEMA-008 Disaster Recovery Assistance Files of Record dated April 30, 2013. The Privacy Impact Assessment PIA the supports this collection is DHS/FEMA/PIA-049 Individual Assistance Program.

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.

It has been estimated that a total of 2,216,579 applicants will apply for Individuals and Households Program Assistance annually.

The number of individuals using the FEMA 1-800 Tele-Registration number for completing FEMA Form 009-0-1T (English) is estimated to be 1,151,255. It has been estimated that it takes approximately 20 minutes (.3333) to complete a registration and the total annual hour burden for the Tele-Registration process is 383,713 hours.

The number of individuals using the Internet for completing FEMA Forms 009-0-1Int and 009-0-2Int (English and Spanish) is estimated to be 323,040. It has been estimated that it takes approximately 20 minutes (.3333) for applicants to complete a registration through the Internet and the total annual hour burden for the Internet registration is 107,669 hours.

The number of individuals using the paper versions of FEMA Form 009-0-1 and 009-0-2 Paper (English and Spanish) is estimated to be 51,549. It has been estimated that it takes approximately 18 minutes (.3000) for applicants to complete a paper registration and the total annual hour burden for the paper application is 15,465 hours.

The number of individuals using their Smartphone for completing FEMA Form 009-0-1S (English) and 009-0-2S (Spanish) is estimated to be 192,447. It has been estimated that it takes approximately 20 minutes (.3333) for applicants to complete a registration using a Smartphone and the total annual hour burden for the Smartphone is 64,143 hours.

It has been estimated that 51,549 of applicants will complete FEMA Forms 009-0-3 and 009-0-4 (English and Spanish), Declaration and Release once they have registered for disaster assistance by completing FEMA Form 009-0-1 and 009-0-2, paper registration. This is a result of applicants who were unable to apply for disaster assistance on line or via the call center. It is estimated that it takes approximately 2 minutes (.03333) for applicants to review and sign FEMA Form 009-0-3 and 009-0-4 (English and Spanish). The total annual hour burden is 1,717 hours.

The number of respondents completing FEMA Form 009-0-5 (English) and 009-0-6 (Spanish), Manufactured Housing Unit Revocable License and Receipt for Government Property is estimated at 1% (22,166) of the total number of applicants registering for disaster assistance. Historically, approximately 1% of the total number of applications for disaster assistance, annually, result in awarding Direct Temporary Housing Assistance. It is estimated to take approximately 15 (.2500) minutes for applicants to review and sign FEMA Form 009-0-5 (English) and 009-0-6 (Spanish), Manufactured Housing Unit Revocable License and Receipt for Government Property. The total annual hour burden is 5,542 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.
- 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 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
Individuals or Households	Tele-registration Application for Disaster Assistance / (English) FEMA Form 009-0-1T	1,151,255	1	1,151,255	0.3333 (20 mins.)	383,752	\$35.54	\$13,638,546
Individuals or Households	Internet application for Disaster Assistance / (English and Spanish) FEMA Forms 009-0-1Int and 009-0-02Int	323,040	1	323,040	0.3333 (20 mins.)	107,680	\$35.54	\$3,826,947
Individuals or Households	Paper Application for Disaster Assistance / (English and Spanish) FEMA Forms 009-0-1 and 009-0-2	51,549	1	51,549	0.3 (18 mins.)	15,465	\$35.54	\$549,626
Individuals or Households	Smartphone Application for Disaster Assistance / (English and Spanish) FEMA Forms 009-0-1S and 009-0-2S	192,447	1	192,447	0.3333 (20 mins.)	64,149	\$35.54	\$2,279,855
Individuals or Households	Declaration and Release (English and Spanish) / FEMA Forms 009-0- 3 and 009-0-4	51,549	1	51,549	.0333 (2 mins.)	1,718	\$35.54	\$61,057
Individuals or Households	Manufactured Housing Unit Revocable License and Receipt for Government Property (English and Spanish) FEMA Forms 009-0-5 and 009-0-6	22,166	1	22,166	0.25 (15 mins.)	5,542	\$35.54	\$196,963
Individuals or Households	Request for Information (RFI), English and Spanish	429,573	1	429,573	0.1666 (10 mins.)	71,595	\$35.54	\$2,544,486
Total		2,221,579		2,216,579		649,902		\$23,036,485

[•] 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 May 2017 National Occupational Employment and Wage Estimates (www.bls.gov) the wage rate category for All Occupations is estimated to be ($$24.34 \times 1.46$) = \$35.54 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents is \$23,094,460 annually and the total estimated burden in hours is 649,902 hours.

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

- 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 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.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [350 remote contract personnel performing Tele-Registration at \$20 per hour for approximately 10 hours per day for 180 days] 350 x (20 x 10 x 180)	12,600,000
Staff Salaries [193 GS-9 employees at \$36.12 (24.74 x 1.46) per hour for approximately 10 hours per day for 180 days] 193 x (36.12 x 10 x 180)	12,548,088
Facilities [Average of \$42 per square foot for approximately 35,000 sq ft to lease a temporary Disaster Assistance Tele-Registration Center] 42 x 35,000	1,470,000
Computer Hardware and Software [Cost for 350 FEMA workstations used to take teleregistrations at \$2,806 per workstation. Workstation cost includes laptop, monitors, adapters, keyboard, mouse, desk phone and headset with applicable accessories] 350 x 2806	982,100
Equipment Maintenance [estimated 10% of the computer hardware and software cost]	98,210

Travel [10 FEMA staff at \$6,500 per employee to travel to remote sites for two weeks to provide start up assistance and orientation for supervisory personnel managing the Tele-Registration Call Center. This estimate includes airfare, hotel, rental car, and meals and incidentals.) 10 x 6,500	65,000
Printing [Estimated cost of \$15.00 for 500 copies of FEMA Form 009-0-1 to be printed and sent to 14 Disaster Recovery Centers.] 15.00 x .14 =210	210.00
Postage [cost to mail 2,216,596 copies of FEMA Form 009-0-1 to applicants at .41 per mailing based on annual registration projections] 2,216,596 x \$0.41	908,804
Other [Cost of security badges for 350 contract personnel at \$93.39 each for security profile setup and badge creation] 350 x 93.39	32,686
Total	\$28,705,098

^{*} Note: The "Salary Rate" includes a 1.46 multiplier to reflect a fully-loaded wage rate.

The above table outlines estimated expenses to support the project of collecting \$28,705,098 average annual applications for Federal assistance. Contractor cost covers remote call center surge staff (350) hired on a temporary basis to handle overflow registrations that FEMA cannot support. Staff salaries are projected for 193 FEMA staff assigned to take the initial part of the 2,216,596 registration load. Facility expense is estimated to be \$1,470,000 for a temporary call center facility leased for one year. Computer Hardware and Software expenses supports the 350 FEMA personnel with workstations to perform Registration Intake. Equipment maintenance covers repair and replacement for the 350 workstations at 10% of the equipment cost. Travel is projected for 10 FEMA staff to provide orientation for remote call center management staff at the start-up of a remote facility. Printing cost is estimated \$210 for completed 009-0-1 forms that used at the Disaster Recovery Center when staff are unable to access the application. Postage covers the mailing of the printed documents. Other expenses cover the cost for security profiles to be setup and security badges to be issued for 350 call center staff.

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
Tele-registration Application for Disaster Assistance / (English) FEMA Form 009-0-1T				345,377	383,714	+38,337
Internet application for Disaster Assistance / (English and Spanish) FEMA Forms 009-0-1Int and 009-0-02Int				96,912	107,670	+10,758
Paper Application for Disaster Assistance / (English and Spanish) FEMA Forms 009- 0-1 and 009-0-2				15,465	15,465	0
Smartphone Application for Disaster Assistance / (English and Spanish) FEMA Forms 009-0-1S and 009-0-2S				57,734	64,143	+6,409
Declaration and Release (English and Spanish) / FEMA Forms 009- 0-3 and 009-0-4				36,657 4,296.75	1,717	-34,940

Government				
Property (English				
and Spanish) FEMA				
Forms 009-0-5 and				
009-0-6			4,296.75	
D				
Request for				
Information (RFI),				
English and Spanish		71,595.5	71,595.5	0
Total(s)		628,037.25	648,601.25	+20,564

Explain:

This collection is being revised in order to capture applicant self-assessment information as well as identifying information. There is an increase in burden.

FEMA Form 009-0-1T burden hours has changed based on the approval of the Applicant Self-Assessment Questions, Identity-Proofing Questions and FEMA Form 009-0-3(English) and 009-0-4(Spanish). The information from the self-assessment questions will allow FEMA to better manage its resources and provide assistance to survivors who need it most in a more expeditious manner. FEMA has implemented identity proofing questions within the registration process. The applicant must answer four questions to confirm their identity. By imbedding Form 009-0-3(English) and 009-0-4(Spanish) the respondent will not have to complete a paper form.

FEMA Form 009-01Int and FEMA Form 009-0-2Int burden hours has changed based on the approval of the Applicant Self-Assessment Question, Identity-Proofing Questions and FEMA Form 009-0-3(English) and 009-0-4(Spanish). The information from the self-assessment questions will allow FEMA to better manage its resources and provide assistance to survivors who need it most in a more expeditious manner. By imbedding Form 009-0-3(English) and 009-0-4(Spanish) the respondent will not have to complete a paper form.

FEMA Form 009-0-1S(English) and FEMA Form 009-0-2S(Spanish) burden hours has changed based on the approval of the Applicant Self-Assessment Question, Identity-Proofing Questions and FEMA Form 009-0-3(English) and 009-0-4(Spanish). The information from the self-assessment questions will allow FEMA to better manage its

resources and provide assistance to survivors who need it most in a more expeditious manner. By imbedding Form 009-0-3(English) and 009-0-4(Spanish) the respondent will not have to complete a paper form.

FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish), Declaration and Release form is imbedded within FEMA Form 009-0-1. This allows the respondent to attest to being a citizen, non-citizen national or qualified alien of the United States when applying for disaster assistance. Prior to this change respondents would be required to attest to their citizenships when a FEMA Inspector would complete the damage assessment. Currently, the FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish), Declaration and Release form will only be completed when 009-0-1(Paper) is completed.

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 for the publication thereof for this information collection, in the manner described above.

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 no statistical methodology involved in this collection.