

THE SUPPORTING STATEMENT

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (herein called Stafford Act), Public Law 93-288, as amended, 42 U.S.C. 5121 et seq. ;the United States Code, Title 42.; the Public Health and Welfare, Chapter 68.; Disaster Relief Sec. 425. Case Management Services (42 U.S.C. 5189d) (Pub. L. 93-288, title IV, § 426, as added Pub. L.109-295, title VI, § 689f, Oct. 4, 2006, 120 Stat. 1453.); indicate that the President may provide case management services, including financial assistance, to State or local government agencies or qualified private organizations to provide such services, to victims of major disasters to identify and address unmet needs.

The Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA) reorganized the Federal Emergency Management Agency (FEMA), provided it new authority, and authorized FEMA to provide disaster case management assistance that will identify and address unmet needs of survivors of major disasters in accordance with the existing Acts, Laws, and Statutes.

The Stafford Act, combined with the PKEMRA, gives the President of the United States authority to direct FEMA to coordinate and fund federal agencies to support impacted States with response and recovery assistance capabilities, and this includes a disaster human services case management (DHSCM) system or care, following a major disaster.

Public Law (PL 111-117—DEC. 16, 2009 123 STAT. 3251) and all subsequent Consolidated Appropriations Acts from Fiscal Year(s) (FY) 2010 through to 2018 authorized discretionary funds under Children and Families (ACF) for the development and provision and sustainment of a DHSCM system of care capability, in accordance with the above statutes.

To supplement and improve on data and Personally Identifiable Information (PII) in support of providing Immediate Disaster Case Management (IDCM) and in accordance with the aforementioned Laws, Acts, and all Federal, Department, Agency, and Operating Division (OpDiv) authorities, rules and regulations, information technology security requirements for the protection of Personal Identifiable Information (PII) the ACF Electronic Case Management Record System (ECMRS) is used.

ECMRS is aligned in accordance with Executive Order of the President 13589 and the memorandum to the Heads of Executive Departments and Agencies M-12-12 from the Office of Management and Budget to “Promote Efficient Spending to Support Agency Operations.”

The ECMRS is the only federal information repository used when IDCM program services are provided to disaster survivors. The ECMRS is an ACF owned information technology (IT) system. It is part of the ACF Office of the Chief Information Officer’s (OCIO) inventory of systems and operates in accordance with the ECMRS System Security Plan dated July 7, 2017, the Privacy Impact Assessment dated January 27, 2017, the HHS approved Risk Assessment dated June 23, 2017 and the Security Assessment Report dated June 23, 2017, and as outline in the Authority to Operate (ATO) received July 2017.

2. Purpose and Use of the Information Collection

Throughout the year, major and minor disasters affect the United States within the continental states and outside the continental states. Once a disaster area has been declared by the Federal Government, part of the response is to initiate the Immediate Disaster Case Management (IDCM) program. This activation is done at the request of the State or Territory or Commonwealth. Once requested, the IDCM program deploys to the disaster areas and begins connecting respondents with local and Federal assistance through disaster case management sessions in a face-to-face environment.

The primary instruments used to conduct a disaster Intake and Triage will then generate referrals for disaster assistance to the respondent requires that an Intake and Triage be completed within the Emergency Case Management Records System (ECMRS.)

The ECMRS will be used to collect and manage information from the disaster-affected survivors. This information includes demographics, disaster caused unmet needs, and records the various referrals for assistance provided to the respondent. Information collected uses the ECMRS standard assessment forms within the overall information collection session. Through IT automation, these assessments are electronically completed and contained within the ECMRS. The respondent information and referral sources are then auto populated through the systems to generate a personal recovery plan that is then given to the respondent.

The IDCM intake and triage sessions are used to collect and enter respondent information into the ECMRS for the purpose of assessing the immediate unmet needs of respondents, populating a Disaster Recovery Plan which provides disaster assistance referrals to the Respondent for local entities which have resources available to meet the disaster caused unmet needs of the Respondent. While, under perfect conditions, all sessions are completed within the ECMRS, in certain instances, with power outages being a real possibility, physical forms may be needed as well in order to effectively conduct a session.

3. Use of Improved Information Technology and Burden Reduction

ACF created the ECMRS, which is an integrated system that assesses respondent needs and links them to appropriate resources for referral and management during emergency responses in 2017. Previously, the collection was done on paper. The ECMRS is designed to enhance the delivery of safe and effective disaster relief services by workers and offers an electronic method for assessing and subsequent reporting of information collected. The ECMRS is a paperless system that reduces respondent burden with improved information technology. IDCM workers electronically enter data collected from respondents using standard assessment forms using the ECMRS. The electronic workflow process within the ECMRS is automated through the system and through this inherent efficiency, will reduce the respondent burden.

Once the assessment forms are completed the ECMRS compiles, completes and populates, a recovery template that is then auto-populated with demographic information, a tiered category of unmet needs and referral data, and then linked to the unique survivor record which is provided to the survivor. The collection, protection, and storage of the respondent data entered by the worker

into the ECMRS is completed in accordance with ACF OCIO governance procedures.

4. Efforts to Identify Duplication and Use of Similar Information

No other Federal IT systems duplicate and use the similar information collected and entered into the ECMRS, to date.

The listed assessments are physical copies of those assessments. They are completed within the ECMRS.

5. Impact on Small Businesses or Other Small Entities

There is no impact to small businesses and small entities.

6. Consequences of Collecting the Information Less Frequently

The recent climatic events have created catastrophic disasters within United States, tribes, and territories. There are looming public health issues related to these climatic events, especially among at risk populations. These public health risks include contracting water-borne and vector-borne diseases, substance abuse, and mental health concerns, including PTSD, depression, anxiety, and homelessness.

If respondent information is collected less frequently, inefficiencies will be created in the delivery of IDCM program. The impact will be negative, respondents will not receive the access to services, and resources they need to address their immediate disaster caused unmet needs.

The consequences for not collecting this information include, but are not limited to prolonged periods of time where survivors will not be able to recover from the effects of the disaster prolonged periods of homelessness, poverty, mental and physical health problems, death, diseases, and familial separation may result from reduced information collection efforts.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Information is collected at the time of the initial Intake and Triage session when the Respondent comes in to receive referrals to local resources. The initial information collection within the Electronic Case Management Records System is entered once at the time of the initial Intake and Triage session.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The 60-day notice was published in the Federal Register on February 15, 2018 (83 FR 6852). No comments were received.

The 30-day notice was published in the Federal Register on June 1, 2018 (83 FR 25463).

9. Explanation of Any Payment or Gift to Respondents

This is not applicable because there are no payments or gifts that apply to the use of these assessments.

10. Assurance of Confidentiality Provided to Respondents

The Electronic Case Management Record System (ECMRS) is the only federal information repository used IDCM services. The ECMRS is an ACF owned information technology (IT) system.

It is part of the ACF Office of the Chief Information Officer's (OCIO) inventory of systems. The system has a designated Information System Security Officer (ISSO) and a System Owner (SO). The data collected and entered into this system when used, is securely stored, accessed and protected within the ECMRS as outlined in system ATO and SSP.

Confidentiality provided to respondents is assured in accordance with, but not limited to the aforementioned Laws, Acts, and all Federal, Department, Agency, and Operating Division (OpDiv) authorities, rules and regulations This includes information technology security requirements for the protection of Personal Identifiable Information (PII), the department of HHS approved ECMRS System Security Plan (SSP) and the ECMRS Authority to Operate (ATO) previously mentioned in this FRN.

All IDCM workers receive training on security awareness, the rules of behavior requirements; and they must comply with the E-Government Act of 2002, Clinger-Cohen Act of 1996, Office of Management and Budget (OMB) Circular A-130, Privacy Act of 1974, Children's Online Privacy Protection Act (COPPA), Paperwork Reduction Act Federal Information Security, Management Act of 2002 (FISMA) requirements for security awareness for users of federal information systems, NIST issues standards and guidelines to assist federal agencies in implementing security and privacy regulations, and all HHS and ACF FEMA rules, regulations, policies and procedures. FEMA guidance through the DHS Privacy Office *-Handbook for Safeguarding Sensitive PII*, and the FEMA Recovery Policy Statement 9420.1 (September 9, 2013), *-Secure Data Sharing*, provides specific criteria for ensuring the security and safeguarding respondents PII including physical transport of PII, electronic transfer and workspace security requirements when collecting PII. In addition, a Consent form is provided to the respondent.

11. Justification for Sensitive Questions

There is no sensitive data collected through the standard assessment forms or the ECMRS. Respondent PII collected is limited to respondent name, phone number, and address. Information collected throughout the United States and territories will be collected in Spanish or English, depending which language version of the ECMRS is activated.

12. Estimates of Annualized Burden Hours and Costs

The chart below lays out the burden hours associated with the review and completion of the Intake and Triage in order to complete an effective IDCM Intake and Triage session.

To allow for the effective and accurate completion of the Intake and Triage of the Respondent’s immediate unmet needs, the forms in both Spanish and English are interchangeable depending on language needs. This is to say that only one language version will be used, not both English and Spanish during a disaster case session.

Burden hours are merely estimates. Disaster based mission assignments by their very nature are unpredictable in the time requirements for completing assessments and conducting sessions. Logistical, cultural, educational and environmental factors can extend the time needed to provide an effective and complete Disaster Intake and Triage Session for the respondent.

Prior individual assistance numbers have been adjusted as earlier estimates were based on a single disaster event localized to portions of a single state.

For this updated information collection, data information from Hurricanes Harvey and Maria was used to estimate of the number of individuals that would request IDCM assistance through the IDCM program during concurrent Mission Assignments.

Based on these variables and depending on the language needs (English or Spanish forms) as the forms are reviewed and completed, the estimated total aggregate burden for completing all assessments whether the information collection uses the English or Spanish forms will be one hour.

For the table below the estimate burden hours consist of seven respondents per worker with 500 workers in three deployments with an overall deployment date range of 180 days. Up to 500 workers could use the system concurrently. During recent deployment fidelity and validation assessments the burden time per respondent was averaged at 1 hour (or 60 minutes) per respondent.

Instrument	Number of Respondents across an estimated 180 day deployment	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Intake Session and information collection and assessments in English and Spanish, of Respondents immediate unmet needs	630,000	1	One	630,000

Aggregate Burden Hours:

630,000 individual respondents take 1hour to complete all assessments for an estimated 630,000 aggregate burden hours.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There is no annual cost burden to the respondent

14. Annualized Cost to the Federal Government

For the purpose of this submission, a base estimate is made from information resulting from Hurricanes Maria and Harvey in 2017 and ACF’s capability to process respondents. This estimate allows IDCM personnel to go through all applicable questions with the Respondent. For IDCM personnel working with a large household with multiple needs, the burden hours may be longer. The number of respondents may increase or decrease contingent upon the size of the disaster and the severity of devastation. Participation in the IDCM program is voluntary, which may affect the overall numbers of Respondents seeking assistance.

Annualized costs to the Federal Government

Electronic Collection of Respondent Data (Paid through Stafford Act Disaster Relief Funds)
\$18,459,000.00

The annualized cost is estimated to be \$18,459,000.00. The Stafford Act Disaster Relief Funds appropriated by Congress to FEMA and earmarked to support States the President declares major disaster areas and eligible for Individual Assistance, pays for the cost of collecting respondent data. The annualized cost estimate of \$18,459,000.00 is not paid through ACF’s Federal Administrative Budget or the special congressional appropriation used to fund the annual ACF IDCM program operational budget. Collecting respondent data is directly linked to funding provided through FEMA/HHS mission task orders to ACF for the emergency support requests on behalf of the declared State and for disaster human services case management in alignment with the NRF.

Because disaster events and the activation of the IDCM program cannot be predicted given the nature of disasters, the annualized cost estimate was derived using ACF IDCM capability based planning and factors associated in coordination with information collected during the Hurricane Harvey and Maria deployments, such as mandated contract costs, respondent burden time, and length of time over activation periods in which respondent data was collected. This includes

ACF's capability to support three concurrent or overlapping IDCM mission assignment activations, as well. Because every disaster and the recovery support requested is unique to each State and disaster event, cost estimates listed are dependent on the individualized requirements of the declared State and the needs listed in the FEMA/HHS mission assignment.

Respondents have no cost or share of cost responsibility to pay in this electronic collection.

The Federal Government assumes a cost per respondent. Stafford Act, Disaster Relief Funds are obligated to pay for these costs.

The mandated contracted rate used was \$20.00 an hour and the hourly fringe rate was \$9.30.

The respondent burden time drives the cost per respondent. Based on the mandated contracted labor rates from the ACF IDCM program support used in Hurricane Harvey & Maria and Department of Labor (DOL) fringe rates, the cost per respondent is \$29.30.

Capability-based factors/assumptions and prior electronic data collection activations, when annualize, indicates ACF could process 630,000 respondents at a cost estimate of \$18,459,000.00.

For a example, if ACF is collecting respondent data for three (3) concurrently ran or overlapping IDCM program deployments supporting three (3) separate disaster events (on averaged at 180 days per event) using the ECMRS with a respondent burden time of (1hr/or 60 minutes per respondent) a total of 630,000 respondents, at the rate of 1 hour per respondent for \$29.30 per burden hour, the annualized burden estimate of cost is \$18,459,000.00.

15. Explanation for Program Changes or Adjustments

The Spanish language version of the ECMRS was created to support the Hurricane Maria response in the Commonwealth of Puerto Rico. This reasonable accommodation was based on the need to provide services to a vast amount of respondents that did not speak, write, or read English or had limited to no comprehension of the language, or from a cultural standpoint, wanted to be spoken to in the Spanish language. Because the IDCM worker completes the assessments electronically through the ECMRS and the system automates the creation of a disaster recovery plan, translating the assessment forms into Spanish was a necessity.

Therefore, this submission is requesting a review of the Spanish language standard assessment forms that supplement the English forms. The assessment questions have been translated in to Spanish and are identical to the English language version. Data points collected in the English and Spanish assessment versions are used for the same identical purpose. There is no difference or change to the electronic completion of assessment forms and automation processing of an IDCM data file within the ECMRS. This way, respondents can be processed through the IDCM program services using Spanish and will receive a Spanish language recovery plan. The addition

of these alternate assessment forms in Spanish also provides opportunity for the provision of culturally and linguistically sensitive IDCM services for States where the primary language spoke is Spanish.

A recent increase in disaster responses, improved data from the responses to Hurricanes Harvey and Maria, and increased technological efficiencies have prompted ACF to increase the estimated number of respondents from 3,500 to 630,000 and the corresponding burden from 2,333 hours to 630,000 hours.

When ACF made its 2015 submission, there was no electronic system for processing intake information. Additionally, the estimate of the burden underestimated the time necessary for hand processing the intake information. With the move to the electronic system, ACF is able to provide relief services to a much larger population in a much more efficient manner. The increased service provision and improved efficiency, in combination with the improved data and the recent increase in disaster responses is the source of the increase in the burden associated with this submission.

16. Plans for Tabulation and Publication and Project Time Schedule

The DHHS ACF IDCM program has no current business use or plan to publish any respondent information collected in the ECMRS.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not Applicable

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not Applicable