

Disaster Information Collection Form

**OMB Information Collection Request
0970 - 0476**

Supporting Statement Part A - Justification

April 2019

Supporting Statement A – Justification

Summary

1. Circumstance which make the Collection of Information Necessary

The Administration for Children and Families (ACF) oversees more than 60 programs that affect the normal day to day operations of families, children, individuals and communities in the United States. Many of these programs encourage grantees or state administrators to develop emergency preparedness plans, but do not have statutory authority to require these plans be in place. ACF facilitates the inclusion of emergency preparedness planning and training efforts for ACF programs.

Combinations of the following laws enable ACF to utilize these disaster information collection forms:

- Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288)¹ to fulfill disaster response and recovery efforts as mission assigned by the Federal Emergency Management Agency (FEMA)
- Pandemic and All-Hazards Preparedness Reauthorization Act² (Public Law 113-5) in order to coordinate with the HHS Assistant Secretary for Preparedness and Response (ASPR) in order for HHS leadership to make decisions in response and recovery for impacted families.
- Post-Katrina Emergency Management Reform Act (PKEMRA)³ of 2006 (Public Law 109-295) for ACF to provide human services support to fulfill disaster response and recovery requirements for ACF programs.

Presidential Policy Directive-8 (PPD-8)⁴ provides federal guidance and planning procedures under established phases – protection, preparedness, response, recovery, and mitigation. The Disaster Information Collection Forms addressed in this clearance

¹ U.S. Department of Homeland Security. Robert T. Stafford Act Disaster Relief and Emergency Assistance Act. DHS c2013. [Cited 2016 February 23]. Available from: <https://www.fema.gov/robert-t-stafford-disaster-relief-and-emergency-assistance-act-public-law-93-288-amended>

² U.S. Department of Health and Human Services. Pandemic and All-Hazards Preparedness Reauthorization Act. DHHS c2016. [Cited 2016 February 23]. Available from: <http://www.phe.gov/Preparedness/legal/pahpa/Pages/pahpra.aspx>

³ Post Katrina Emergency Management Reform Act of 2006. Congress; c2006. [cited 2016 February 23] Available from: <https://www.congress.gov/bill/109th-congress/senate-bill/3721>

⁴ U.S. Department of Homeland Security. Presidential Policy Directive / PPD-8: National Preparedness. DHS; c2011 [cited 2016 February 23]. Available from: <https://www.dhs.gov/presidential-policy-directive-8-national-preparedness>

process provide assessment of ACF programs in disaster response, and recovery.

ACF/Office of Human Services Emergency Preparedness and Response (OHSEPR) has a requirement under PPD-8, the National Response Framework⁵, and the National Disaster Recovery Framework⁶ to report disaster impacts to ACF-supported human services programs to the HHS Secretary's Operation Center (SOC) and interagency partners. ACF/OHSEPR works in partnership with the Assistant Secretary for Preparedness and Response (ASPR), and the Federal Emergency Management Agency (FEMA) to report assessments of disaster impacted ACF programs and the status of continuity of services and recovery.

Many disasters are unpredictable and come without notice, and the completion of the Disaster Information Collection Forms is important for ACF to assess that programmatic needs are met during and after a disaster. The roles of the offices are as follows:

ACF/OHSEPR: Once a disaster strikes, ACF/OHSEPR reaches out to ACF programs to determine any impacts to a programs normal operations. Once the forms are released to ACF programs, then the data gathered will be utilized for impact assessment and to fulfill a reporting requirement to ACF leadership and programs, emergency management agencies and partners.

ACF Programs: The ACF programs will reach out to the grantees and/or state administrators to complete the Disaster Information Collection Forms, with the support of ACF regional emergency management specialists. The ACF program staff will gather the data and forward to ACF/OHSEPR so that the assessment information can be analyzed and reported to ACF leadership and programs, the HHS SOC, and FEMA.

It is the responsibility of ACF programs and OHSEPR to assess, identify gaps, and facilitate recovery that promotes the continuity of ACF human services programs provided to the people we serve.

⁵ U.S. Department of Homeland Security. National Response Framework. DHS; c2015 [cited 2019 April 01]. Available from: <http://www.fema.gov/national-response-framework>

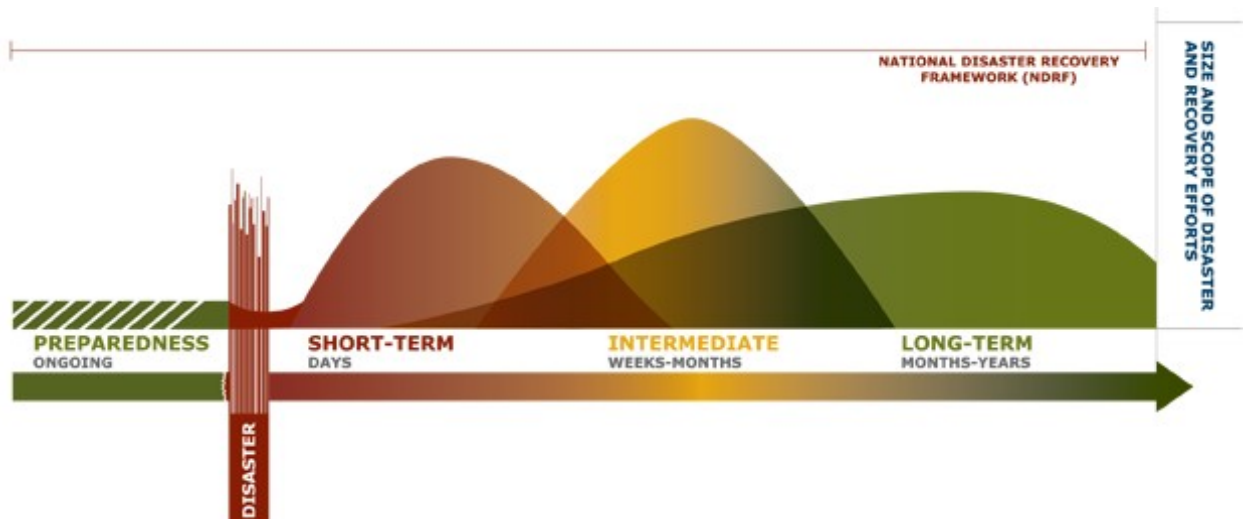
⁶ U.S. Department of Homeland Security. National Disaster Recovery Framework. DHS; c2015 [cited 2019 April 01]. Available from: <http://www.fema.gov/national-disaster-recovery-framework>.

ACF programs are at heightened risk after a disaster, they serve vulnerable individuals, children, and families. During Superstorm Sandy, five ACF regions were impacted. At the peak of the storm recovery, 697 child care providers, and 86 Head Start centers were impacted in New York, New Jersey, and Connecticut alone. This kind of information is imperative for ACF/OHSEPR to facilitate support, and technical assistance from the ACF programs that are impacted by the storm.

These Disaster Information Collection Forms will be used before, during, and after a disaster, both natural (e.g., tornado, earthquake, hurricane) and man-made (e.g., chemical spill, water contamination) disasters. Disasters destroy homes; damage local infrastructure and disrupt children, individuals, and families operations. Disasters interrupt services and social support networks, thus negatively affecting community well-being.

The recovery phase of a disaster involves moving the community back towards normal functioning. Recovery is immediate and overlaps with response. It includes actions such as providing essential public health and human services operations.⁷

Figure A.1.1. The Recovery Continuum



2. Purpose and Use of the Information Collection

The assessment information collected in the Disaster Information Collection Forms on ACF program impacts will be used to provide

⁷ U.S. Department of Homeland Security. National Response Framework. DHS; c2013 [cited 2019 April 01]. Available from: <http://www.fema.gov/national-response-framework>

near-real time updates during the response and recovery phases of a disaster. The information collected will be on programs within the disaster-affected area, and neighboring areas.

The Disaster Information Collection Forms will be a key source of information on ACF program impact. The assessment will provide information to respond to inquiries about ACF human services response and recovery efforts, specifically for children and families that need the support of ACF programs following a disaster. The collected data will help the ACF programs provide technical assistance and impact-specific subject matter expertise to the State and the impacted grantees.

The assessment that is received from the ACF programs (discretionary and mandatory), grantees, and/or state administrators is reported to the ACF Assistant Secretary and leadership. The Disaster Information Collection Form assessment also serves as a reporting requirement for ACF/OHSEPR. The analysis is shared, as appropriate, with the White House via the FEMA-produced Senior Leadership Brief.

The Disaster Information Collection Forms will be requested by Regional (if applicable) or Central Office ACF program staff to the ACF grantees or state administrators. The grantees or administrators will submit the information to the ACF program staff. ACF program staff will work with ACF/OHSEPR to compile the data and provide a synopsis for analysis of programmatic impacts for ACF senior leadership and interagency partners.

The information gathered in these data collection forms will be used to assess the response and recovery gaps of ACF programs 30 days to one (1) year post disaster.

3. Use of Improved Information Technology and Burden Reduction

The Disaster Information Collection Form is delivered to respondents via email. Respondents return the form via email. If the impacted grantees/administrators are unable to access a computer due to damages from a disaster, ACF Program staff will work with the grantees/administrators to enter the data into the form.

4. Efforts to Identify Duplication and Use of Similar Information

No similar information is available.

5. Impact on Small Businesses or Other Small Entities

Not applicable. Small businesses and small entities are not impacted.

6. Consequences of Collecting the Information Less Frequently

While disasters are in many respects unpredictable ACF/OHSEPR provides ACF-wide Advisory Reports and Situation Reports on the status and impact of disasters. These reports are also shared at the departmental level.

It is imperative that we are able to collect specific information regarding the impacts of ACF programs immediately after an event to ensure that ACF is providing a strategic and timely response to meet the needs of individuals, children, families, local grantees, implementing agencies, and the surrounding communities.

Real-time impact information on the disaster is vital for recovery, and future planning efforts for ACF programs.

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

The information requested is needed immediately following a disaster and will ensure that emergency responders have a mechanism in place to guide their strategic response and recovery efforts. The collection of information will fall within the 30 day response timeframe because the information gathered in this data collection will be used to support a coordinated response during the initial outreach stage when emergency response personnel and federal government resources may be conducting damage assessments to aid recovery efforts in the impacted disaster zones.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on February 5, 2019, Volume 84, Number 24, page 1739, and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

Not applicable

10. Assurance of Confidentiality Provided to Respondents

Not applicable

11. Justification for Sensitive Questions

Not applicable

12. Estimates of Annualized Burden Hours and Costs

An estimate of the number of disasters that would warrant data collection is difficult to calculate due to the unpredictable nature of disasters. For example, in 2012, there were 95 disasters nationwide but OHSEPR did not collect data on all of them because they had minimal effects on ACF programs.

The annualized burden hours is estimated based on the average use of Disaster Information Collection Forms over the past three years. See Table A.12.1 for a list of previously approved generic information collections (GenICs) under this umbrella generic.

Gen IC Title	# Respondents	Responses Per Respondent	Hours per response	Burden Hours
Children's Bureau Information Collection Plan	10	1	1	10
Office of Child Care Disaster Information Collection Plan	7	1	2	14
Office of Head Start (OHS) Disaster Information Collection Form	10	1	2	20
Runaway and Homeless Youth (RHY) Disaster Information Collection Plan	10	1	1	10
Family Violence Prevention Services Program (FVPSP) Disaster Information Collection Plan	10	1	1	10
Total # Respondents:	47	Total Burden Hours:		64

The approved GenICs listed in Table A.12.1 are included in this request for an extension, as the ACF program offices will continue to use these forms.

Table A.12.2 provides the requested burden for next three years of approval.

Instrument	Estimated total Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Annual Burden Hours	Average Hourly Wage	Annual Cost
Disaster Information Collection Form	50	1	1.5	75	\$17.22	\$861.00

The average hourly wage was obtained from the Bureau of Labor Statistics job code 21.093. The wage data from April 2019 is \$17.22 per hours. To account for fringe benefits and overhead, the rate is multiplied by two which is \$34.44. The estimate of the annualized cost to respondents for hour burden is \$34.44 times 75 or \$2,583.

Table 12.3 provides the total burden request for the next three years to include previously approved GenICs in addition to the estimated burden for new forms.

Instrument	Estimated total Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Annual Burden Hours
Previously Approved GenICs	47	1	1.4 (avg)	64
New Disaster Information Collection Forms	50	1	1.5	75
Total Respondents:	97		Total Burden:	89

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

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

Federal staff costs are contingent on disaster frequency. In the event of a disaster federal staff costs are estimated to be 20% of the time (8 hours out of 40 per week) of a Program Specialist (GS-12 Step 1) to oversee the data collection, respond to inquiries, and aggregate the data. Estimating that the disaster information collection will last approximately six months (24 weeks) at this rate.

GS-12 rate of \$39.20 x 8 hours x 24 weeks = \$7,526.40 (total estimated cost)

15. Explanation for Program Changes or Adjustments

There are no changes to the information collection since the last OMB approval. This request is to continue use of the overarching generic clearance, including submission of new generic information collections (GenICs) and the continued use of previously approved GenICs.

16. Plans for Tabulation and Publication and Project Time Schedule

Not applicable. Will not publish data.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submission

Not applicable. No statistical methods of analysis of the Disaster Information Collection Form are proposed.