




FEMA

MEMORANDUM FOR: The Honorable Paul Ray
Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Elizabeth A. Cappello
Chief Information Officer (Acting)
Department of Homeland Security

FROM: Tracey L. Showman 
Chief Administrative Officer
Mission Support
DHS Federal Emergency Management Agency

SUBJECT: Emergency Approval Request of New Information Collection to
Office of Management and Budget (OMB) Collection 1660-00NW
Coronavirus (COVID-19) Donations Web Portal; FEMA Form 248-
0-0-1, FEMA.gov Donations Web Portal

The Federal Emergency Management Agency (FEMA) seeks emergency approval for a new information collection to the Office of Management and Budget (OMB) Collection 1660-00NW Coronavirus (COVID-19) Donations Web Portal in accordance with Emergency Management Declarations (EM) 3427-3487 or Major Disaster Declarations (DR) 4480-4482. It is vital that FEMA implement the information collection as soon as possible to support immediate needs in response to the COVID-19 pandemic. 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 have occurred.

FEMA requests approval for OMB Collection 1660-00NW COVID-19 Donations Web Portal to include:

- Collection of Company Information;

- Collection of Company Point of Contact Information (individuals cannot donate); and
- Logistical details of goods for potential donations in direct support of COVID-19 response.

Mission Essential Information

Because of the substantial risk to life, safety, or health of individuals due to the probable shortage in emergency medical equipment, supporting distribution infrastructure and other life-sustaining equipment related to COVID-19 treatment, FEMA requests an Emergency Waiver to collect the necessary information from potential donors and incorporate the voluntary donations web portal into the FEMA.gov internet site. This information will allow FEMA to collect voluntary information from donors on possible donations of key equipment and resources that can be distributed to key organizational recipients directly responding to the COVID-19 pandemic.

The web portal will collect business contact information from POCs as well as descriptive information about an entity's potential donation item, the location of the items, and the amount of goods being donated. The system then generates a notification email to an inbox monitored by a FEMA action officer for intake. The action officer determines if the goods being donated are needed by any organization responding to the COVID-19 situation and uses the information to connect donor making donations with organizations in need by helping to coordinate the movement of those goods either on their own or through contracts. The type of coordination and assistance will vary depending on the type and number of items being donated and the need for the donation. For example, FEMA will provide the donor with contact information for nearby organizations in need or FEMA will contract the nationwide shipment of a large supply of items from the donor.

Paperwork Reduction Act Timeframes

FEMA.gov donations web portal: There is already a drastic need for the equipment that will be donated through the portal and it's vitally important to get immediate clearance to proceed with the portal. FEMA will use an internet web portal to voluntarily collect basic information on companies that can donate equipment and logistical resources. This data collection will streamline collection and allow for FEMA and DHS to control information and reduce manual data collection to include physical forms. By implementing this tool into the donation process for the holistic COVID-19 response, FEMA will ensure the critical delivery of life-sustaining medical equipment and the availability of legitimate and usable equipment to receiving organizations most in need.

Public Harm is Reasonably Likely to Result if Normal Clearance Procedures are followed

FEMA.gov donations web portal: Public harm will result without the immediate implementation of the FEMA.gov donations web portal. The FEMA.gov donations web portal provides the

ability to collect logistical and technical information on resources to organize and prioritize distribution quickly and efficiently. FEMA's use of the web portal will ensure that COVID-19 support organizations are provided with assistance first. If FEMA were required to follow the normal clearance process there would be a delay in collecting the necessary information to distribute drastically needed goods and supplies to key organizational recipients directly responding to the COVID-19 pandemic.

FEMA.gov donations web portal: Had this functionality been available, FEMA would already be matching voluntarily donated resources with organizations most in need of equipment (e.g. New York City). Indeed, had this tool been available at the start of the Federal response, there would already be an inventory of available resources for donation. If this capability is not immediately made available, serious injury or death to American citizens may result due to lack of medical equipment and resources for organizations that provide life-sustaining services to those that have contracted serious cases of the COVID-19 virus.

Unanticipated Events

The COVID-19 pandemic continues to increase exponentially, and the scope of the impact to Americans is not yet known. However, based on the effect in other countries, we know that life-sustaining medical equipment and resources will soon be in short supply, and FEMA must act immediately to coordinate donations efficiently.

Conclusion

Following the normal clearance procedures for OMB approval to collect voluntary information during the COVID-19 pandemic response will delay FEMA's ability to assist organizations directly providing life-sustaining services to COVID-19 infected survivors. Every day the pandemic situation worsens in the United States, and public requests for immediate action multiply. As discussed, FEMA certifies that this request meets the requirements of 5 C.F.R. § 1320.13(a) and it is vital that this new collection be implemented immediately 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 will result if normal clearance procedures are followed, and (4) unanticipated events have occurred.

Thank you for your consideration.