

Immediate Disaster Case Management Intake Assessment

**OMB Information Collection Request
0970 - 0461**

Supporting Statement Part A - Justification

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Submitted By:
Office of Human Services Emergency Preparedness and Response
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

This information collection is related to and funded by Federal Emergency Management Authority, as authorized by Section 426 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, 42 U.S.C., and is being conducted by Office of Human Services Emergency Preparedness and Response (OHSEPR). The information is necessary for OHSEPR to collect in order to ensure delivery of services to disaster victims and to make necessary quality improvements.

2. Purpose and Use of the Information Collection

The primary purpose of the information collection pertains to the implementation of ACF/OHSEPR's delivery of case management services to individuals and households impacted by a disaster. OHSEPR's disaster case managers collect information during intake assessments that is utilized to identify a disaster survivor's unmet needs and connect them with resources. OHSEPR also utilizes this information to target resources and improve its disaster human services operations.

The information collection will be used to support ACF/OHSEPR's goal to quickly identify critical gaps, resources, needs, and services to support state, local and non-profit capacity for disaster case management and to augment and build human service capacity where none exists. All information gathered will be used to (1) provide case management services to survivors and (2) inform the delivery of disaster case management services and programmatic strategies and improvements (including Quality Assurance/Performance Improvement processes).

3. Use of Improved Information Technology and Burden Reduction

The information is collected through an electronic system used by case managers who receive specific training, including use of personal identifying information. The system greatly reduces respondent burden through built-in algorithms that streamline response options and patterns. All information gathered is exclusively used to inform the delivery of disaster case management services and programmatic strategies and improvements. Since the data is being collected by case managers based on intake interviews with survivors, the public burden is significantly reduced.

4. Efforts to Identify Duplication and Use of Similar Information

The information collection is unique to the program and is not available through any other sources.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

The information is only collected in the event of a disaster related to and funded by Federal Emergency Management Authority, as authorized by Section 426 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, 42 U.S.C. As such, the burden should be minimal as it is not conducted on a regular basis.

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

Not applicable

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 March 25, 2020, Volume 85, Number 58, page 16947, and provided a sixty-day period for public comment. During the notice and comment period, no comments were received.

9. Explanation of Any Payment or Gift to Respondents

Not applicable

10. Assurance of Confidentiality Provided to Respondents

The disaster clients' information will be protected in accordance with the Privacy Act of 1974 but will not be maintained in an HHS/ACF system of records.

11. Justification for Sensitive Questions

Demographic information including age, date of birth, and income may be collected to determine if individuals qualify for certain federal and state assistance programs. HHS/ACF is authorized to disclose this information under routine use (H)(1) of DHS/FEMA-008, Disaster Recovery Assistance Files, System of Records Notice, 74 Fed. Reg. 48763, 48765-6, (September 24, 2009), and HHS/ACF will not further disclose this information to any entities other than to its direct contractor.

Disaster Case Management (DCM) services, to include information collection, is pursuant to a signed consent that describes how case managers use and share information provided by clients. This HHS-approved consent is in addition to any consent required by FEMA for release of information. The consent form is signed at enrollment.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Immediate Disaster Case Management Intake Assessment	33,489	1	1	33,489	11,163	18.40	205,399.20
Estimated Annual Burden Total:					11,163	Estimated Annual Cost Total:	\$205,339.20

The cost to respondents was calculated using the [Census Bureau Poverty Wage](#) multiplied by 1.5 percent given that disaster victims are disproportionately low income individuals, which is \$9.20 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$18.40. The estimate of total annualized cost to respondents for hour burden is \$18.40 times 11,163 hours or \$205,399.20.

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

This will vary depending on the number of disasters. During the past three years, there has been an average of 1 major disaster per year where a task order was issued for DCM; however, for planning purposes, the cost is based on 3 task orders, which is very possible given the increase in major hurricanes in recent years.

Because disaster events and the activation of the DCM 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 past 3 years (Hurricanes Maria, Harvey, and CA Camp Fires), 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 DCM 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 (planning for 3 annually) and prior electronic data collection activations, when annualize, indicates ACF could process 33,489 respondents.

For example, if ACF is collecting respondent data for three (3) concurrent DCM program deployments supporting three (3) separate disaster events using the ECMRS with a respondent burden time of (1hr/or 60 minutes per respondent) a total of 33,489 respondents, at the rate of 1 hour per respondent for \$29.30 per burden hour, the annualized burden estimate of cost is \$981,227.70.

15. Explanation for Program Changes or Adjustments

The estimated number of respondents has been updated based on the previous three years of experience. The result is a reduced number of estimated respondents, and therefore overall burden has decreased.

There is one modification to the proposed use of resulting aggregate data, to include a use of the data to develop a Quality Assurance/Performance Improvement process.

16. Plans for Tabulation and Publication and Project Time Schedule

The time-frame for the duration of IDCM services is established at up to 180 days but depends on the nature of the disaster and the needs of the disaster survivors. For the purpose of data collection, this information is generally collected in the first four weeks following a disaster.

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

Not applicable

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.