

May 15, 2020

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0061

Title: Federal Assistance to Individuals and Households Program

Form Number(s):

FEMA Form 010-0-11, Individuals and Households Program (IHP) - Other Needs Assistance Administrative Option Selection

Development of State/Tribal Administrative Plan (SAP) for Other Needs Provision of IHP

FEMA Form 010-0-12 (English), Individuals and Households Program Application for Continued Temporary Housing Assistance

FEMA Form 010-0-12S (Spanish), Programa de Individuos y Familias Solicitud Para Continuar La Asistencia de Vivienda Temporera

Request for Approval of Late Registration

Appeal of Program Decision

FEMA Form 009-0-95 (English), Request for Advance Disaster Assistance

FEMA Form 009-0-95S (Spanish), Solicitud de Adelanto de la Asistencia por Desastre

FEMA Form 009-0-96 (English), Request to Stop Payment and Reissue Disaster Assistance Check

FEMA Form 009-0-96S (Spanish), Solicitud para Detener el Pago y Reemitir el Cheque de Asistencia por Desastre

FEMA Form 140-003d-1 – (English), Authorization for the Release of Information Under the Privacy Act

FEMA Form 140-003d-1S – (Spanish), Autorización para la Divulgación de Información bajo el Acta de Privacidad

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 the Federal Emergency Management Agency (FEMA) to provide financial assistance and services to individuals applying for disaster assistance benefits in the event of a federally declared disaster. Regulations in *44 CFR, § 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 or emergency, have uninsured or under-insured, necessary expenses and serious needs, and are unable to meet such expenses or needs through other means.

This information collection provides disaster survivors the opportunity to request approval of late applications, continued temporary housing assistance, request advance disaster assistance, stop payments not received in order to be reissued funds, and to appeal program decisions. This collection also allows for the establishment of an annual agreement between FEMA and states, territories, and tribal governments regarding how the Other Needs provision of IHP will be administered: by FEMA, by the state, territory, or tribal government, or jointly. If the information in this collection is not collected, a delay in assistance provided to disaster survivors would occur.

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 collected is used to ensure disaster survivors are provided with eligible assistance for disaster related necessary expenses or serious needs that are unable to be met through other means in an efficient and timely manner.

FEMA Form 010-0-11 – States, territories, and tribal governments must submit an *IHP ONA Administrative Option Selection* form, which includes a *Standard Personal Property List* for the calendar year, to FEMA annually. This form establishes the state, territory, or tribal government’s proposed level of support and participation in the delivery of assistance under Section 408 of the Stafford Act. The FEMA Regional Director or designee and the state, territory, or tribal government use the agreement for planning purposes and to develop program implementation procedures to be used during the upcoming calendar year for programs under Section 408 of the Stafford Act. This agreement also includes the determination if an *Administrative Plan* is warranted.

Development of State/Tribal Administrative Plan for the Other Needs provision of IHP – When the state, territory, or tribal government’s request for a FEMA grant to provide financial assistance to individuals and households under the Other Needs provision of IHP is approved, the state, territory, or tribal government must provide an *Administrative Plan* to address the necessary level of managerial and resource support. This ensures FEMA can effectively monitor and account for program costs and ensure equitable and timely delivery of assistance.

FEMA Forms 010-0-12 (English) and 010-0-12S (Spanish) – After initial assistance is provided to an individual, FEMA may provide continued rental assistance based on need. Applicants requesting continued rental assistance are required to submit a signed *Application for Continued Temporary Housing Assistance* (English) or *Solicitud para Continuar la Asistencia de Vivienda Temporera* (Spanish) which includes gross income information, household expenses, and a plan for permanent housing. FEMA caseworkers review the submitted information in accordance with established program criteria and procedures to determine the individual’s eligibility for continued rental assistance.

Request for Approval of Late Registration – After the registration period for a declared disaster ends (60 days from date of declaration), FEMA will accept late registration requests for an additional 60 days. For FEMA to effectively review the late registration request, the individual’s request must explain the reason(s) for the registration delay and must be provided in writing to FEMA.

Appeal of Program Decision – After an initial eligibility decision is made, FEMA provides applicants with the opportunity to inquire or appeal any assistance eligibility determination. For FEMA to effectively respond to an applicant’s appeal, the applicant must indicate what determination is being appealed, the reason, and must submit the appeal in writing. A FEMA Appeals Officer reviews the information submitted in

accordance with established program criteria and procedures to determine the validity of the appeal and if the applicant should be awarded further disaster assistance as a result of the appeal.

FEMA Forms 009-0-95 (English) and 009-0-95S (Spanish) – For an applicant with homeowners, renters, mobile home, or condominium insurance to be determined eligible for rental assistance, the applicant must provide FEMA with verifiable documentation confirming insurance does not cover Additional Living Expenses (ALE) for temporary housing costs, the full policy ALE coverage/amount has been exhausted, there is less than one month Fair Market Rent (FMR) coverage remaining, or ALE is denied for the applicable cause of damage. The *Request for Advance Disaster Assistance* (English) and *Solicitud de Adelanto de la Asistencia por Desastre* (Spanish) forms allow the applicant the option to request advanced rental assistance for insured disaster related expenses if the insurance company takes longer than 30 days to provide the verifiable documentation needed by FEMA.

FEMA Forms 009-0-96 (English) and 009-0-96S (Spanish) – When an applicant is determined eligible for IHP financial assistance but did not select the electronic funds transfer option to receive payment, the award check is sent via postal mail to the applicant’s mailing address. If the applicant contacts FEMA and indicates the award check has not been received more than 14 days after the check was issued, the applicant can complete the *Request to Stop Payment and Reissue Disaster Assistance Check* (English) or *Solicitud para Detener el Pago y Reemitir el Cheque de Asistencia por Desastre* (Spanish) form to request FEMA stop payment on the previous check issued, and to reissue the award to the applicant for the same amount. The form also allows the applicant to confirm the current mailing address to ensure the new award check is sent to the correct location.

FEMA Form 140-003d-1 – (English), Authorization for the Release of Information Under the Privacy Act; FEMA Form 140-003d-1S – (Spanish) Autorización para la Divulgación de Información bajo el Acta de Privacidad – FEMA must have written consent from an applicant or co-applicant to release registration information to a third party, unless otherwise allowed by law. Currently, there is not a standard OMB approved form for applicants or co-applicants to use to provide written consent. An applicant or co-applicant must submit either a handwritten or typed statement outlining personal identifying information, what information can be released, the parties the information can be released to, the applicant or co-applicant’s signature, and must either be notarized or include a declarative statement regarding the validity of the information in the written statement. The creation of the *Authorization for the Release of Information Under the Privacy Act* and *Autorización para la Divulgación de Información bajo el Acta de Privacidad* reduces applicant burden by providing them with a standardized form, which

will save the applicant or co-applicant time and reduce confusion regarding what information is necessary for written consent.

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.

FEMA Form 010-0-11 – This form, and the *Standard Personal Property List* for the calendar year included with the form, must be submitted to FEMA via email annually by states, territories, and tribal governments. The form is emailed to a designated FEMA Program Management Section (PMS) distribution list and requires original signatures by the Governor or Tribal Chief Executive or designee, and the FEMA Regional Administrator or designee.

Development of State/Tribal Administrative Plan for the Other Needs provision of IHP – When a state, territory, or tribal government selects Joint or State Option to administer the Other Needs provision of IHP, a signed *Administrative Plan* must be submitted to the FEMA Regional Administrator via email. The Regional Office will send the *Administrative Plan* to FEMA PMS via email for evaluation and visibility.

FEMA Forms 010-0-12 (English) and 010-0-12S (Spanish) – In an effort to reduce applicant burden and expedite the review process, applicants may submit these forms to FEMA via mail, fax, in person at a local Disaster Recovery Center (DRC), or through scanning and uploading to their Disaster Assistance Center Applicant Inquiry (DAC AI) account, if an account was created at the time of initial disaster assistance registration. Applicants may locate local DRCs on the www.disasterassistance.gov website or by calling FEMA’s Helpline at 800-621-3362 (FEMA). Local DRC information may also be provided via local media blasts via radio, TV, etc.

Request for Approval of Late Registration – In an effort to reduce applicant burden and expedite the review process, applicants may submit these forms to FEMA via mail, fax, in person at a local Disaster Recovery Center (DRC), or through scanning and uploading to their Disaster Assistance Center Applicant Inquiry (DAC AI) account, if an account was created at the time of initial disaster assistance registration. Applicants may locate local DRCs on the www.disasterassistance.gov website or by calling FEMA’s Helpline at 800-621-3362 (FEMA). Local DRC information may also be provided via local media blasts via radio, TV, etc.

Appeal of Program Decision – In an effort to reduce applicant burden and expedite the review process, applicants may submit these forms to FEMA via mail, fax, in person at a

local Disaster Recovery Center (DRC), or through scanning and uploading to their Disaster Assistance Center Applicant Inquiry (DAC AI) account, if an account was created at the time of initial disaster assistance registration. Applicants may locate local DRCs on the www.disasterassistance.gov website or by calling FEMA's Helpline at 800-621-3362 (FEMA). Local DRC information may also be provided via local media blasts via radio, TV, etc.

FEMA Forms 009-0-95 (English) and 009-0-95S (Spanish) – In an effort to reduce applicant burden and expedite the review process, applicants may submit these forms to FEMA via mail, fax, in person at a local Disaster Recovery Center (DRC), or through scanning and uploading to their Disaster Assistance Center Applicant Inquiry (DAC AI) account, if an account was created at the time of initial disaster assistance registration. Applicants may locate local DRCs on the www.disasterassistance.gov website or by calling FEMA's Helpline at 800-621-3362 (FEMA). Local DRC information may also be provided via local media blasts via radio, TV, etc.

FEMA Forms 009-0-96 (English) and 009-0-96S (Spanish) – In an effort to reduce applicant burden and expedite the review process, applicants may submit these forms to FEMA via mail, fax, in person at a local Disaster Recovery Center (DRC), or through scanning and uploading to their Disaster Assistance Center Applicant Inquiry (DAC AI) account, if an account was created at the time of initial disaster assistance registration. Applicants may locate local DRCs on the www.disasterassistance.gov website or by calling FEMA's Helpline at 800-621-3362 (FEMA). Local DRC information may also be provided via local media blasts via radio, TV, etc.

FEMA Form 140-003d-1 – (English), Authorization for the Release of Information Under the Privacy Act; FEMA Form 140-003d-1S – (Spanish) Autorización para la Divulgación de Información bajo el Acta de Privacidad – In an effort to reduce applicant burden and expedite the review process, applicants may submit these forms to FEMA via mail, fax, in person at a local Disaster Recovery Center (DRC), or through scanning and uploading to their Disaster Assistance Center Applicant Inquiry (DAC AI) account, if an account was created at the time of initial disaster assistance registration. Applicants may locate local DRCs on the www.disasterassistance.gov website or by calling FEMA's Helpline at 800-621-3362 (FEMA). Local DRC information may also be provided via local media blasts via radio, TV, etc.

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 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.

This information collection does not have an impact on small businesses or other small entities.

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.

If the information is not collected from an applicant, several negative impacts could occur. Applicants who failed to apply within the initial registration timeframe will be unable to receive disaster assistance; applicants with a continuing need for rental assistance will be unable to receive said assistance; applicants who disagree with FEMA program eligibility decisions will have no recourse to have eligibility decisions reviewed; insured applicants will be unable to receive disaster assistance in a timely manner due to waiting for insurance documentation; applicants who did not receive an issued assistance check will be unable to request the previous payment be stopped and the assistance reissued; and the burden placed on applicants wishing to provide written consent to third parties who may be able to further assist them with disaster related needs will more substantial.

If the information collection from the states, territories, and tribal governments is not conducted or is conducted less frequently, there will be a negative impact on FEMA's ability to implement the Other Needs provision of IHP. The information collected is used for disaster preparation and the assistance implementation process, which includes determining staffing levels and resource allocation. The information collected allows FEMA to understand the requirements and capabilities of states, territories, and tribal governments, which includes the ability to determine the level of federal dedication the states, territories, and tribal governments expect from FEMA. Failure to collect this information may result in delay or rejection of a state, territory, or tribal government's request to administer the Other Needs provision of IHP.

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.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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 March 11, 2020, 85FR 14212]. **3 of comments were received.**

Comment 1: The commenter suggested that FEMA could minimize the burden for veterans with disabilities by having their patient advocates or service organizations asking if they have any unmet needs. Additionally, the commenter suggested that when a disability hinders someone's ability to understand things and when those serious needs have continued to not be met can deteriorate a service member's mental health dramatically. Finally the commenter stated that when service members need to apply to

many different organizations and ask for help only to be advised to contact someone else without help can be very discouraging. Rather, a simple phone call from someone that has access to important information and the ability to help that person can really help. FEMA has initiated interrelated projects to increase the communication of the needs of registrants with disabilities across our programs and better support the needs of survivors with disabilities. Recognizing the need for more effective and actionable disability-related questions in the Registration Intake form (covered in OMB collection 1660-0002, Disaster Assistance Registration), FEMA is in the process of submitting a revision to OMB collection 1660-0002 to add a specific reasonable accommodation question, and an additional question capturing disability-related losses. The reasonable accommodation question will ask registrants to indicate if they have a disability-related need to access FEMA's programs and services. FEMA's Individual Assistance (IA) Program and Office of Equal Rights (OER) are working to develop a written procedure to arrange for any accommodation/modification, and to develop training documents/curricula for all FEMA personnel involved in providing accommodations to disaster survivors. The *Federal Register* Notice for 1660-0002 which outlines the reasonable accommodation question addition should be posted in the near future for public comment.

The reasonable accommodation question was developed through collaboration between the FEMA Office of Disability Integration and Coordination (ODIC), the FEMA OER, the FEMA IA Program, the FEMA Office of External Affairs, and other relevant offices within FEMA. In addition to these offices, ODIC sought input from the National Council on Disability (NCD) to validate the language included in the question. NCD is an independent Federal agency charged with advising the President, Congress, and other

Federal agencies regarding policies, programs, practices, and procedures that affect people with disabilities.

With the addition of the reasonable accommodation question in the registration intake form, FEMA will be better able to identify and assist applicants with completing the forms included in 1660-0061 (request for late application review, submitting appeals, completing the Authorization for the Release of Information form, requesting advance disaster assistance, and stop payment requests).

In addition, the policies regarding how and why FEMA can share applicant information are not in place to make it harder for veterans and others with disabilities to receive the help they need, but to protect them from fraud and identity theft by ensuring only those who have appropriate consent from the applicant can access their information. FEMA generally communicates directly with each applicant throughout the IHP process to gather information, inform them of their eligibility for assistance, refer them to other sources of assistance, and guide them on the proper use of IHP funds.

FEMA also generally communicates directly with each applicant to protect their private information. The Privacy Act of 1974 regulates how FEMA collects, uses, and discloses an applicant's personal information in order to protect the privacy of the applicant, and requires FEMA to obtain written consent from the applicant in order to share their disaster assistance records with a third party. For example, FEMA employees and contractors will always verify an applicant's identity before discussing eligibility or potential assistance. After verifying their identity with FEMA, the applicant can also

give verbal permission for FEMA to speak with a third party regarding their case via the FEMA Helpline.

FEMA may share applicant information outside FEMA with entities such as States, territorial, Tribal, and local governments, voluntary organizations, and other organizations in accordance with published routine uses identified in DHS/FEMA-008 Disaster Recovery Assistance Files System of Records Notice. FEMA shares this information to enable the applicant to receive additional disaster assistance, prevent a duplication of benefits, and prevent future disaster losses.

Comment 2: The second comment was not a germane comment.

Comment 3: The commenter suggested that it should be made clear whether the Coronavirus pandemic falls within the bounds of a declared disaster or emergency which justifies provision of FEMA assistance of the type discussed after a disaster or emergency to aid in housing, food sources, medical needs, and other forms of aid provided by FEMA after an earthquake or hurricane, which should also be available to those families and persons needing assistance during the coronavirus emergency. At this time, the only declaration provided for Individual Assistance for COVID-19 is specific to Crisis Counseling. The Individuals and Households Program has not been authorized; therefore, FEMA is not accepting disaster assistance registrations for COVID-19 at this time and is not providing assistance under the Individuals and Households Program. *News Release HQ-20-091* dated April 9, 2020 on *FEMA.gov* about rent suspension is only in regard to disaster survivors who were already receiving temporary housing from

FEMA in FEMA-provided Temporary Housing Units. For further information regarding FEMA's response to COVID-19, please visit <https://www.fema.gov/coronavirus>.

A 30-day Federal Register Notice inviting public comments was published on May 22, 2020, 85 FR 31196. **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.

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 benefits.

10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.

A Privacy Threshold Analysis was approved on May 19, 2020. This collection is supported by an existing Privacy Impact Assessment (PIA), *DHS/FEMA/PIA-009(b) Document Management and Records Tracking System*, approved by DHS on April 6, 2018 and an existing System of Records Notice (SORN), *DHS/FEMA 008 Disaster Recovery Assistance Files*, 78 FR 25282 approved by DHS on April 30, 2013.

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 a 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.

Forms completed by states, territories, and tribal governments:

- **FEMA Form 010-0-11, Individuals and Households Program (IHP) – Other Needs Assistance Administrative Option Selection** – The estimated number of respondents for this collection instrument is 555 (50 states, 5 territories, and 500 federally recognized tribal governments). The substantial increase in estimated respondents is due to ongoing training and outreach conducted by the Regions to assist tribal governments in understanding and participating in the Other Needs provision of IHP. The frequency of completing this instrument is once annually. Each form is estimated to take 1.08 hours to complete. The total annual hour burden is 599 hours.
- **Development of State/Tribal Administrative Plan for the Other Needs provision of IHP** – The estimated number of respondents for this collection instrument is 4 and the frequency of completing this instrument is once annually. The estimated number of respondents is based on the current number of states, territories, and tribal governments requesting to participate in the administration and management of the Other Needs provision of IHP through selecting Joint or State Option on *FEMA Form 010-0-11, Individuals and Households Program Other Needs Assistance Administrative Option Selection*. Each document is estimated to take 2 hours to complete. The total annual hour burden is 8 hours.

Forms completed by applicants:

The number of applicant forms completed as part of this information collection is driven by the number and magnitude of declared disasters each year and varies substantially from year to year. The below annual estimates for applicant forms were obtained from

FEMA's Recovery Reporting and Analytics Division (RAD) and are based on historical data from 2005 through 2019.

- **FEMA Form 010-0-12, Individuals and Households Program Application for Continued Temporary Housing Assistance** – The number of respondents for this collection instrument is estimated at 13,110 and the frequency of completing this instrument is four times annually, for a total of 52,440 submissions. Each form is estimated to take 1 hour to complete. The total annual hour burden is 52,440 hours.
- **FEMA Form 010-0-12S, Programa de Individuos y Familias Solicitud para Continuar la Asistencia de Vivienda Temporera** – The number of respondents for this collection instrument is estimated at 1,658 and the frequency of completing this instrument is four times annually, for a total of 6,632 submissions. Each form is estimated to take 1 hour to complete. The total annual hour burden is 6,632 hours.
- **Request for Approval of Late Registration** – The number of respondents for this collection instrument is estimated at 4,405 and the frequency of completing this instrument is one time annually. This instrument is a letter written and submitted by the applicant and is estimated to take 0.75 (45 minutes) to complete. The total annual hour burden is 3,304.
- **Appeal of Program Decision** – The number of respondents for this collection instrument is estimated at 116,559 and the frequency of completing this instrument is one time annually. This instrument is a letter written and submitted by the applicant and is estimated to take 0.75 (45 minutes) to complete. The total annual hour burden is 87,419.
- **FEMA Form 009-0-95 (English), Request for Advance Disaster Assistance** – The number of respondents for this collection instrument is estimated at 381 and the frequency of completing this instrument is one time annually. This instrument is a letter written and submitted by the applicant and is estimated to take 0.17 (10 minutes) to complete. The total annual hour burden is 65.
- **FEMA Form 009-0-95S (Spanish), Solicitud de Adelanto de la Asistencia por Desastre** – The number of respondents for this collection instrument is estimated at 52 and the frequency of completing this instrument is one time annually. This instrument is a letter written and submitted by the applicant and is estimated to take 0.17 (10 minutes) to complete. The total annual hour burden is 9.
- **FEMA Form 009-0-96 (English), Request to Stop Payment and Reissue Disaster Assistance Check** – The number of respondents for this collection

instrument is estimated at 2,922 and the frequency of completing this instrument is one time annually. This instrument is a letter written and submitted by the applicant and is estimated to take 0.08 (5 minutes) to complete. The total annual hour burden is 234.

- **FEMA Form 009-0-96S (Spanish), Solicitud para Detener el Pago y Reemitir el Cheque de Asistencia por Desastre** – The number of respondents for this collection instrument is estimated at 780 and the frequency of completing this instrument is one time annually. This instrument is a letter written and submitted by the applicant and is estimated to take 0.08 (5 minutes) to complete. The total annual hour burden is 62.
- **FEMA Form 140-003d-1 – (English), Authorization for the Release of Information Under the Privacy Act** – The number of respondents for this collection instrument is estimated at 231 and the frequency of completing this instrument is one time annually. This instrument is a letter written and submitted by the applicant and is estimated to take 0.17 (10 minutes) to complete. The total annual hour burden is 39.
- **FEMA Form 140-003d-1S – (Spanish), Autorización para la Divulgación de Información bajo el Acta de Privacidad** – The number of respondents for this collection instrument is estimated at 96 and the frequency of completing this instrument is one time annually. This instrument is a letter written and submitted by the applicant and is estimated to take 0.17 (10 minutes) to complete. The total annual hour burden is 16.

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 1.4 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 No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost

					hours)			
State, Local, or Tribal Government	Other Needs Assistance Administrative Option Selection / FF 010-0-11	555	1	555	1.08	599	\$85.96	\$51,490
State, Local, or Tribal Government	Development of State/Tribal Administrative Plan for Other Needs Provision of IHP / No Form	4	1	4	2	8	\$85.96	\$688
Individuals or Households	Individual and Households Program Application for Continued Temporary Housing Assistance / FF 010-0-12	13,110	4	52,440	1	52,440	\$37.55	\$1,969,122
Individuals or Households	Programa de Individuos y Familias Solicitud para Continuar la Asistencia de Vivienda Temporera / FF 010-0-12S	1,658	4	6,632	1	6,632	\$37.55	\$249,032
Individuals or Households	Request for Approval of Late Registration / No Form	4,405	1	4,405	0.75	3,304	\$37.55	\$124,065
Individuals or Households	Appeal of Program Decision / No Form	116,559	1	116,559	0.75	87,419	\$37.55	\$3,282,583
Individuals or Households	Request for Advance Disaster Assistance / FF 009-0-95	381	1	381	0.17	65	\$37.55	\$2,441
Individuals or Households	Solicitud de Adelanto de la Asistencia por Desastre / FF 009-0-95S	52	1	52	0.17	9	\$37.55	\$338

Individuals or Households	Request to Stop Payment and Reissue Disaster Assistance Check / FF 009-0-96	2,922	1	2,922	0.08	234	\$37.55	\$8,787
Individuals or Households	Solicitud para Detener el Pago y Reemitir el Cheque de Asistencia por Desastre / FF 009-0-96S	780	1	780	0.08	62	\$37.55	\$2,328
Individuals or Households	Authorization for the Release of Information Under the Privacy Act / FEMA Form 140-003d-1 - English	231	1	231	0.17	39	\$37.55	\$1,464
Individuals or Households	96 / FEMA Form 140-003d-1S - Spanish	96	1	96	0.17	16	\$37.55	\$601
Total		140,753		185,057		150,828		\$5,692,939

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.46¹. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.46, and the entry for the “Avg. Hourly Wage Rate” would be \$62.06. Round to the nearest cent following standard rounding rules (0-4 round down and 5-9 round up).

According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2019 Occupational Employment and Wage Estimates wage rate for All Occupations (SOC 00-

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 2019.” Available at http://www.bls.gov/news.release/archives/ecec_06182019.pdf. Accessed March 2, 2020. The wage multiplier is calculated by dividing total compensation for all workers of \$36.77 by wages and salaries for all workers of \$25.22 per hour yielding a benefits multiplier of approximately 1.46.

² Information on the mean wage rate from the U.S. Department of Labor Bureau of Labor Statistics is available online at: <https://www.bls.gov/oes/tables.htm>

0000) is \$25.72. Including the wage rate multiplier of 1.46, the fully-loaded wage rate is \$37.55 per hour. Therefore, the annual burden hour cost is estimated to be \$5,640,761 (\$37.55 x 150,220 hours).

The wage rate for Management Occupations (SOC 11-0000) is \$58.88. Including the wage rate multiplier of 1.46, the fully-loaded wage rate is \$85.96 per hour. Therefore, the annual burden hour cost is estimated to be \$52,178 (\$85.96 x 607 hours). The total estimated burden hour cost for this collection is estimated to be \$5,692,939 annually.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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.

Annual Cost Burden to Respondents or Recordkeepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents
Total	\$0	\$0	\$0	\$0

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 [Describe]	\$0
Staff Salaries ¹ [85 of GS 9 Step 5 employees spending approximately 10% of time annually processing information received from 140,194 disaster survivors. 12 GS 14 Step 5 employees spending approximately 8.2% of time annually reviewing information from 555 States, Territories, and Tribal governments. (85 x \$69,457 x 0.1 x 1.46 ² = \$861,961) + (12 x \$137,491 x .082 x 1.46 = \$197,525) = \$1,059,486]	\$1,059,486
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Printing [Cost to print approximately 63,534 forms (245,212 pages total) to send to disaster survivors via postal mail at \$.015 per page] 245,212 x .015	\$3,678
Postage [Cost of mailing approximately 63,534 forms to disaster survivors] 63,534 x .41	\$26,049
Travel	\$0
Total	\$1,089,213
¹ Office of Personnel Management 2020 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB.aspx . Accessed March 2, 2020.	
² Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate.	

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.

A "Program increase" is an additional burden resulting from a federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "Program decrease", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"Adjustment" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

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
Other Needs Assistance Administrative Option Selection / FF 010-0-11	60	62	2			
Development of State Administrative Plan for Other Needs Provision of IHP / No Form	12	8	-4			
Application for Continued Temporary Housing Assistance / FF 010-0-12	25,244	52,440	27,196			
Solicitud para Continuar la Asistencia de Vivienda Temporera / FF 010-0-12S	524	6,632	6,108			
Request for Approval of Late Registration / No Form	1,724	3,304	1,580			
Appeal of Program Decision / No Form	37,702	87,419	49,717			
Request for Advance Disaster Assistance / FF 009-0-95	0	65	65			
Solicitud de Adelanto de la Asistencia por Desastre / FF 009-0-95S	0	9	9			
Request to Stop Payment and Reissue Disaster Assistance Check / FF 009-0-96	0	234	234			
Solicitud para Detener el Pago y Reemitir el Cheque de Asistencia por Desastre / FF 009-0-96S	0	62	62			

Authorization for the Release of Information Under the Privacy Act / FEMA Form 140-003d-1 - English	0	39	39			
Autorización para la Divulgación de Información bajo el Acta de Privacidad /FEMA Form 140-003d-1S - Spanish	0	16	16			
Total	65,266	150,290	85,024	0	0	0

Explain:

This information collection is being revised to include several new forms: FF 009-0-95, FF 009-0-95S, FF 009-0-96, FF 009-0-96S, FF 140-003d-1, and FF 140-003d-1S. The addition of these forms benefits applicants by providing them with streamlined processes for requesting advance disaster assistance, requesting assistance sent by check be stopped and reissued if not received, and to authorize the release of their information to designated third parties. The addition of these new forms, along with updated estimates for the current forms in the collection based off historical data received from FEMA’s Recovery Reporting and Analytics Division (RAD), has led to an overall increase in annual burden hours.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (cost currently on OMB inventory)	Program Change (new)	Difference	Adjustment (cost currently on OMB inventory)	Adjustment (new)	Difference
Total	\$0	\$0	\$0	\$0	\$0	\$0

Explain: There is no cost burden for this collection.

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 or the publication thereof for this information collection.

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 the 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.

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”.