



FEMA

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

THROUGH: The Honorable Karen S. Evans
Chief Information Officer
Department of Homeland Security

FROM: Alexandra Travis
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Mission Support
DHS Federal Emergency Management Agency

SUBJECT: **Emergency** Approval Request of Revised Information Collection
Office of Management and Budget (OMB) Collection 1660-0142
Survivor Sheltering Assessment in Support of FP 104-009-18

The Federal Emergency Management Agency (FEMA) seeks **emergency** approval from the Office of Management and Budget (OMB) Collection to revise information collection 1660-0142 Survivor Sheltering Assessment in Support of FEMA Public Assistance Non-Congregate Sheltering Data Sharing during the COVID-19 Public Health Emergency (Interim) FP 104-009-18. It is vital that FEMA implement an alternate method under 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 1660-0142 Survivor Sheltering Assessment in Support of FEMA Public Assistance Non-Congregate Sheltering Data Sharing during the COVID-19 Public Health Emergency (Interim) FP 104-009-18 to include an alternate process to be utilized by State, Tribal or Territorial (STT) governments to collect the following information from the Shelter Resident and provide that data to FEMA:

- Head of Household: First Name
- Head of Household: Last Name
- Head of Household: Phone Number
- Number of Individuals in Household
- Damaged Dwelling Street Address
- Damaged Dwelling City

- Damaged Dwelling State
- Damaged Dwelling Zip Code
- Shelter Name
- Shelter ID
- FEMA Disaster Assistance Registration ID (if available)

1. Mission Essential Information

Because of the substantial risk to life, safety, or health of individuals due to the probable need for special non-congregate sheltering operations due to a very active hurricane season during the COVID-19 public health emergency, FEMA requests an Emergency Waiver to have the STT collect the necessary information from willing shelter residents and provide the information to FEMA to improve sheltering assistance. This will allow FEMA to match the voluntary information from shelter residents with registered applicants to depopulate shelters and facilitate additional services available to the shelter residents affected by mandatory evacuations or non-COVID-19 disasters.

FEMA provides Public Assistance (PA) funding to state, tribal, and territorial (STT) governments (aka PA Applicants) for costs related to emergency sheltering for survivors. Typically, sheltering occurs in facilities with large open spaces, such as schools, churches, community centers, armories, or other similar facilities rather than in non-congregate environments, which are locations where each individual or household has living space that offers some level of privacy (e.g., hotels, motels, casinos, dormitories, retreat camps, etc.). However, FEMA recognizes that sheltering operations during the COVID-19 Public Health Emergency may require STT's to consider additional strategies to ensure that survivors are sheltered in a manner that does not increase the risk of exposure to or further transmission of COVID-19. FEMA will provide flexibility to STT's to take measures to safely conduct non-congregate sheltering activities through the end of 2020 in the event of a declared emergency measures (EM) declaration.

FEMA will encourage STTs operating non-congregate shelters to collect basic shelter resident data. If there is a subsequent Major Disaster Declaration that includes the Individual Assistance (IA) program, FEMA and STTs may begin a bi-lateral exchange of data to coordinate and expedite assistance to shelter residents. This data exchange will enable FEMA to share additional disaster survivor data on losses and needs to STT shelter managers facilitating a coordinated effort to provide resources to shelter residents. This data also provides STTs increased ability for shelter planning and shelter population management.

2. Paperwork Reduction Act Timeframes

FP 104-009-18 Data Synchronization: FEMA and the partner STT can offer vital services to shelter residents during this special public health emergency.

Shelter residents matched to an IA program registration will:

- Have their FEMA registration updated with an accurate shelter location.
- Be notified of any additional available FEMA housing assistance that may be available (examples: Transitional Sheltering Assistance, Rental Assistance, etc.)

- Have essential FEMA registration and assistance data elements sent to STTs to facilitate continued management of non-congregate sheltering and/or transition to other forms of sheltering or housing assistance outside of FEMA assistance

Residents not matched to an IA program registration will:

- Have their record returned to STTs with a status indicating that no FEMA registration was matched. STTs can message to shelter residents that FEMA registration is available, and that additional assistance may be available.
- At the request of STTs, residents may also be contacted by FEMA to initiate FEMA registration

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

FP 104-009-18 Data Synchronization: Public harm will result in the event of a mandatory evacuation or major disaster declaration during the COVID-19 public health emergency without the implementation of the alternate method for collecting shelter resident data under 1660-0142 collection. FEMA's use of the information will ensure that STT shelter residents are provided with proper assistance available to them. If FEMA were required to follow the normal clearance process, which occurs after a major declaration and after deployment of FEMA personnel to the affected area, it will be impossible to collect the necessary information to depopulate shelters efficiently and safely.

Unanticipated Events

The COVID-19 pandemic continues to increase and the scope of the impact to Americans is not yet fully known. In addition, the 2020 hurricane season is expected to be much busier than normal with up to six major hurricanes that can create mandatory evacuations and disaster declarations in the millions of Americans (<https://www.noaa.gov/media-release/busy-atlantic-hurricane-season-predicted-for-2020>). FEMA must act immediately to coordinate sheltering needs during the COVID-19 public health emergency.

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 Americans and provide potentially life-sustaining services. As discussed, FEMA certifies that this request meets the requirements of 5 C.F.R. § 1320.13(a) and it is vital that this revised 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.