# Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0002

Title: Disaster Assistance Registration

### Form Number(s):

FEMA Form 009-0-1T (English), Tele-Registration, Disaster Assistance Registration

FEMA Form 009-0-1Int (English), Internet, Disaster Assistance Registration FEMA Form 009-0-2Int (Spanish), Internet, Registro Para Asistencia De Desastre

FEMA Form 009-0-1 (English), Paper Application / Disaster Assistance Registration FEMA Form 009-0-2 (Spanish), Solicitud en Papel / Registro Para Asistencia De Desastre

FEMA Form 009-0-3 (English), Declaration and Release FEMA Form 009-0-4 (Spanish), Declaración Y Autorización

FEMA Form 009-0-5 (English), Manufactured Housing Unit Revocable License and Receipt for Government Property

FEMA Form 009-0-6 (Spanish), Las Casas Manufacturadas Unidad Licencia Revocable y Recibo de la Propiedad del Gobierno

Request for Information (RFI)

#### **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 – § 206.120 - 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. Individuals and households applying for assistance must provide information detailing their losses and needs through this information collection. The Other Needs Assistance (ONA) provision of the Individuals and Households Program (IHP) provides financial assistance to address disaster-related medical, dental, funeral, childcare, personal property, transportation, and other necessary expenses or serious needs resulting from a major disaster.

FEMA is required to provide meaningful access to its programs and activities for people with disabilities under Section 504 of the *Rehabilitation Act of 1973* and Section 308 of the *Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)*, *Pub. L.* 93-288, as amended.

FEMA regulations at 44 CFR Part 16, Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Federal Emergency Management Agency implement Section 504 of the Rehabilitation Act of 1973, as amended, and the disability-related nondiscrimination provisions set forth in Sections 308 and 309 of the Stafford Act. In addition, Department of Homeland Security (DHS) Directive Number 065-01, Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment) issued 9/25/2013 requires DHS components to provide equal opportunity for qualified individuals with disabilities served or encountered in DHS-conducted programs and activities, including providing any necessary modifications to afford a qualified individual with a disability full enjoyment of the program or activity unless modifications of policies, practices, and procedures would

fundamentally alter the nature of the program, service, or activity, or result in undue financial or administrative burdens to DHS.

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 gathered within this collection is used to determine if the individual is in a federally-declared disaster area and whether they have disaster-caused necessary expenses or serious needs that are unable to be met through other means.

As a result of this proposed collection revision, FEMA will use the disability-related information it receives from survivors to provide accommodations or modifications, as appropriate on an individualized basis, of certain programs, policies, and procedures to provide meaningful access (i.e. a survivor with a disability may require in-person assistance to complete the application or a copy of the registration application in Braille).

**FEMA Forms 009-0-1T (English), Tele-Registration** — When a federally-declared disaster or emergency occurs, a tele-registration 800 number is published for individuals to call and apply for assistance. A FEMA service representative interviews individuals over the telephone utilizing the questions in this information collection and records the information directly into the electronic copy of FF 009-0-1T (English) in FEMA's National Emergency Management Information System (NEMIS) database.

**FEMA Forms 009-0-1Int (English) and 009-0-2Int (Spanish), Internet** – When a federally-declared disaster or emergency occurs, a website is published for individuals to apply for disaster assistance through <a href="www.DisasterAssistance.gov">www.DisasterAssistance.gov</a>, which utilizes FF 009-0-1Int (English) or FF 009-02Int (Spanish). The information collected is electronically transferred into the NEMIS database.

**FEMA Forms 009-0-1 (English) and 009-0-2 (Spanish), Paper** — When a federally-declared disaster or emergency occurs, a tele-registration 800 number and disaster assistance website are published for individuals to apply for FEMA assistance. In rare circumstances where the system is inaccessible or telecommunication capabilities are inoperable, FEMA service representatives will record the individual's information using paper versions of FF 009-0-1 (English) or 009-0-2 (Spanish). Once completed and when the system becomes accessible, the FEMA representative manually enters the information into NEMIS.

**FEMA Forms 009-0-3 (English) and 009-0-4 (Spanish)** – For FEMA disaster assistance eligibility requirements to be met, a household member must be a citizen, non-

citizen national or qualified alien of the United States. FF 009-0-3 (English) or FF 009-0-4 (Spanish) is used to certify the individual's information and eligibility. Information gathered in this form is imbedded within FFs 009-0-1Int, 009-0-2Int, and 009-0-1T, therefore FFs 009-0-3 and 009-0-4 are only utilized in circumstances when FEMA registrations are collected via FFs 009-0-1 or 009-0-2, Paper.

**FEMA Forms 009-0-5 (English) and 009-0-6 (Spanish)** – Individuals who qualify for Manufactured Housing Units (MHU), such as travel trailers, mobile homes, or other fabricated dwellings through FEMA Direct Temporary Housing Assistance are required to acknowledge and accept conditions for receiving and occupying government property. Once an individual is determined eligible for Direct Temporary Housing Assistance, FEMA uses the information collected in FFs 009-0-1, 009-0-2, 009-0-1T, 009-0-1Int, or 009-0-2Int to prepare the *Manufactured Housing Unit Revocable License and Receipt for Government Property* form permitting applicants to use MHUs as temporary housing.

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.

An individual may register for FEMA IHP assistance via <a href="www.DisasterAssistance.gov">www.DisasterAssistance.gov</a> through the internet using a personal computer or internet-capable mobile device, by calling FEMA's 800 toll-free number, or through submission of a paper registration via a FEMA representative. All registration methods are processed through NEMIS in the same manner. NEMIS is an integrated database system used to provide FEMA, states, territories, tribal governments, and other federal agencies with automation and record storage capabilities to perform disaster and non-disaster operations.

**FF 009-0-1T (English)** – The toll-free 800 number allows individuals to register for disaster assistance telephonically with a FEMA representative.

**FF 009-0-1Int (English) and 009-0-2Int (Spanish)** – <u>www.DisasterAssistance.gov</u> allows individuals to register for disaster assistance electronically via the internet.

**FF 009-0-1 (English) and 009-0-2 (Spanish)** – Allows individuals to register for disaster assistance using a paper application.

**FF 009-0-3 (English) and 009-0-4 (Spanish)** – Allows individuals to complete the Declaration and Release Form, which the individual signs electronically or via paper.

**FF 009-0-5 (English) and 009-0-6 (Spanish)** — Not applicable to this question as these forms are not currently available for disaster applicants to access online or complete electronically.

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.

The information is not collected in any other 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.

NEMIS is designed in such a way that small business owners submitting applications for FEMA IHP assistance are automatically referred to the Small Business Administration (SBA) for disaster assistance.

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.

Information in this collection is only gathered when the President declares a major disaster or emergency for FEMA Individual Assistance. To provide disaster assistance to individuals and households within a Presidentially-declared area, this information must first be collected to validate individuals' claims in order to meet applicable federal program requirements.

The consequence if disability-related information is not collected is that FEMA is unable to consistently meet the needs of individuals with disabilities, which is a civil rights requirement.

- 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.

The circumstances contained in item 7 are not applicable to this information collection.

#### 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 September 14, 2020 85 FR 56626. **No comments were received.** 

A 30-day Federal Register Notice inviting public comments was published on December 16, 2020, 85 FR 81482. **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 (PTA) was approved on February 26, 2020. This collection is supported by the existing System of Records Notice (SORN): *DHS/FEMA-008 Disaster Recovery Assistance Files of Record* dated April 30, 2013. The Privacy Impact Assessment (PIA) supporting this collection is *DHS/FEMA/PIA-049 Individual Assistance Program*.

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.

Based on historical data from 2007 through 2019 utilizing Croston's Method for intermittent demand forecasting, it is estimated 938,800 individuals will apply for IHP assistance annually.

The number of individuals using the FEMA 1-800 Tele-Registration number to complete FF 009-0-1T (English) is estimated to be 179,900. The Tele-Registration process takes approximately 22 minutes (.37) to complete and the total annual hour burden is 66,703 hours.

The number of individuals using the Internet to complete FF 009-0-1Int (English) or 009-0-2Int (Spanish) is estimated to be 756,600. Previously, FF 009-0-1S (English) or 009-0-2S (Spanish) was utilized for individuals applying through use of a smartphone. However, a system release occurred which allows the registration process to be completely responsive and accessible to individuals through instrument 009-0-1Int (English) or 009-0-2Int (Spanish). The registration script now automatically resizes appropriately according to the individual's device (i.e. desktop computer, phone, tablet, etc.), therefore the smartphone platform functionality is no longer maintained or accessible. The Internet registration process takes approximately 22 minutes (.37) for an individual to complete, and the total annual hour burden is 277,445 hours.

The number of individuals using the paper versions of FF 009-0-1 (English) or 009-0-2 Paper (Spanish) is estimated to be 2,300. The Paper registration process takes approximately 20 minutes (.33) to complete, and the total annual hour burden is 767 hours.

It is estimated 2,300 individuals will complete FF 009-0-3 (English) or 009-0-4 (Spanish) once they have registered for disaster assistance by completing FF 009-0-1 or 009-0-2, Paper. This is a result of individuals being unable to apply for disaster assistance via the internet through tele-registration. It takes approximately 2 minutes (.03) for individuals to review and sign FF 009-0-3 (English) or 009-0-4 (Spanish), and the total annual hour burden is 77 hours.

The number of individuals completing FF 009-0-5 (English) or 009-0-6 (Spanish) is estimated at 1% (9,388) of the total number of individuals registering for disaster assistance. Historically, approximately 1% of the total annual number of applications for disaster assistance results in awarding Direct Temporary Housing Assistance. It takes approximately 15 minutes (.25) for individuals to review and sign FF 009-0-5 (English) or 009-0-6 (Spanish), and the total annual hour burden is 2,347 hours.

The number of individuals who will be issued FEMA Request for Information (RFI) correspondence to obtain further information to adequately determine eligibility for IHP assistance is estimated at 52,000. It takes approximately 10 minutes (.17) for individuals to review and respond to RFIs, and the total annual hour burden is 8,668 hours.

Combined, it is estimated 1,004,488 responses will be collected, with a total annual hour burden of 356,007 hours.

- 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 hours)	Total Annual Burden (in Hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Individuals or Households	Tele- Registration Application for Disaster Assistance (English) FF 009-0-1T	181,900	1	181,900	0.3667	66,703	\$37.55	\$2,504,698
Individuals or Households	Internet Application for Disaster Assistance (English and Spanish) FFs 009-0- 1Int and 009-0-2Int	756,600	1	756,600	0.3667	277,445	\$37.55	\$10,418,060
Individuals or Households	Paper Application for Disaster Assistance (English and Spanish) FFs 009-0-1 and 009-0-2	2,300	1	2,300	0.3333	767	\$37.55	\$28,801
Individuals or Households	Declaration and Release (English and Spanish) FFs 009-0-3	2,300	1	2,300	0.0333	77	\$37.55	\$2,891

	and 009-0-4							
Individuals or Households	Manufacture d Housing Unit Revocable License and Receipt for Government Property (English and Spanish) FFs 009-0-5 and 009-0-6	9,388	1	9,388	0.2500	2,347	\$37.55	\$88,130
Individuals or Households	Request for Information (RFI) (English and Spanish)	52,000	1	52,000	0.1667	8,668	\$37.55	\$325,483
Total		1,004,488		1,004,488		356,007		\$13,368,063

Instruction for Wage-rate category multiplier: Take each non-loaded "Avg. Hourly Wage Rate" from the BLS website table and multiply that number by 1.46<sup>1</sup>. 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.

According to the U.S. Department of Labor, Bureau of Labor Statistics<sup>2</sup>, the May 2019 Occupational Employment and Wage Estimates wage rate for All Occupations (SOC 00-0000) 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 \$13,368,063 (\$37.55 x 356,007 hours).

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:

<sup>&</sup>lt;sup>1</sup> 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 2020." Available at <a href="https://www.bls.gov/news.release/archives/ecec">https://www.bls.gov/news.release/archives/ecec</a> 06182020.pdf. Accessed August 26, 2020. The wage multiplier is calculated by dividing total compensation for all workers of \$37.73 by wages and salaries for all workers of \$25.91 per hour yielding a benefits multiplier of approximately 1.46

<sup>&</sup>lt;sup>2</sup> Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: <a href="https://www.bls.gov/oes/tables.htm">https://www.bls.gov/oes/tables.htm</a>

- 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.

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 [350 remote local hire personnel performing Tele-Registration at \$20 per hour for 10 hours per day for 180 days] 350 x (20 x 10 x 180)	\$12,600,000				
Staff Salaries [193 GS 9, step 5 employees¹ at \$47.20 (32.33 x 1.46)² per hour for 10 hours per day for 180 days] 193 x (\$47.20 x 10 x 180)	\$16,397,280				
Facilities [Average of \$42 per square foot for approximately 35,000 sq ft to lease a temporary Disaster Assistance Tele-Registration Center] 42 x 35,000	\$1,470,000				
Computer Hardware and Software [350 FEMA workstations provided to local hire personnel to perform Tele-Registration at \$2,886 per workstation.  Workstation costs include laptop, monitors, adapters, keyboard, mouse, desk phone and headset with applicable accessories] 350 x 2,886	\$1,010,100				
Equipment Maintenance [Estimated 10% of the computer hardware and software cost] 1,010,100 x .10	\$101,010				
Travel [10 FEMA employees at \$6,500 per employee to travel to a remote site for 2 weeks to provide start-up assistance and orientation for supervisory personnel managing the temporary Disaster Assistance Tele-Registration Center. Estimate includes airfare, hotel, rental car, meals and incidentals] 10 x 6,500	\$65,000				
Printing [\$15 to print 500 copies of FF 009-0-1 and 009-0-2 to send to 14 Disaster Recovery Centers in the event Internet and Tele-Registration are inaccessible.] 15 x 14	\$210				
Postage [Cost to mail 938,800 copies of FF 009-0-1 to individuals at \$0.55 per mailing based on annual registration projects.] 938,800 x .55	\$516,340				
Other [Cost of security badges for 350 local hire personnel at \$93.39 per security profile setup and badge creation.] 350 x 93.39	\$32,687				
Total	\$32,192,627				
<sup>1</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-">https://www.opm.gov/policy-data-oversight/pay-</a>					

<u>leave/salaries-wages/salary-tables/pdf/2020/DCB\_h.pdf.</u> Accessed August 26, 2020.

<sup>2</sup> 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 an 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.

Adjustment	A di	
-	Adjustment	Difference
(hours currently	(new)	
on OMB		
inventory)		
383,714	66,703	-317,011
107,670	277,445	169,775
15,465	767	-14,698
64,143	0	-64,143
	on OMB inventory) 383,714  107,670  15,465	on OMB inventory) 383,714 66,703  107,670 277,445  15,465 767

Spanish) FFs 009-0-						
1S and 009-0-2S						
Declaration and			0	1,717	77	-1,640
Release (English and						
Spanish) FFs 009-0-3						
and 009-0-4						
Receipt of			0	4,296	2,347	-1,949
Government						
Property (English						
and Spanish) FFs						
009-0-5 and 009-0-6						
Request for			0	71,595	8,668	-62,927
Information (RFI)						
(English and						
Spanish)						
Total	0	0	0	648,600	356,007	-292,593

#### Explain:

The information collection is being revised to capture relevant and accurate disability-related information about survivors and/or members of their households who are individuals with disabilities to provide meaningful access to FEMA programs. The revision also includes the removal of instrument 009-0-1S (English) and 009-0-2S (Spanish). While the average hour burden per response to complete FFs 009-0-1T, 009-0-1Int, 009-0-2Int, 009-0-1, and 009-0-2 has increased due to the revisions, there is an overall decrease in annual burden hours for the collection due to updated forecasting estimates received from the FEMA Recovery Reporting and Analytics Division (RAD) based on historical data from years 2007-2019.

**FF 009-0-1T (English)** – Burden hours have decreased by 317,011 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

**FFs 009-01Int (English) and 009-0-2Int (Spanish)** – Burden hours have increased by 169,775 due to a system release which combined Internet and Smartphone into one comprehensive platform.

**FFs 009-0-1 (English) and 009-0-2 (Spanish)** – Burden hours have decreased by 14,698 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

**FFs 009-0-1S (English) and 009-0-2S (Spanish)** – Burden hours have decreased by 64,143 due to a system release which combined Internet and Smartphone into one comprehensive platform. Smartphone is no longer a maintained or accessible platform – the Internet platform is now accessible through desktop computer, mobile device, tablet, etc.

**FFs 009-0-3 (English) and 009-0-4 (Spanish)** – Burden hours have decreased by 1,640 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

**FFs 009-05 (English) and 009-0-6 (Spanish)** – Burden hours have decreased by 1,949 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

**Request for Information (English and Spanish)** – Burden hours have decreased by 62,927 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

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			
[Form Name/#]									
Total	\$0	\$0	\$0	\$0	\$0	\$0			

*Explain:* N/A – there is no Annual Cost Burden associated with 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.

There are no outline plans for tabulation and publication of data 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 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.

There is no statistical methodology involved in this collection.