




FEMA

March 16, 2021

MEMORANDUM FOR: Dominic Mancini
Acting Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Eric Hysen
Chief Information Officer
Department of Homeland Security

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

SUBJECT: Emergency Approval Request of Revisions to Office of Management and Budget (OMB) Collection 1660-0002 Disaster Assistance Registration in support of COVID-19 Funeral Assistance

The Federal Emergency Management Agency (FEMA) seeks **emergency** approval from the Office of Management and Budget (OMB) to revise information collection 1660-0002 Disaster Assistance Registration to allow Call Center staff to use a current instrument in a modified manner. It is vital that the revisions to the currently approved information collection be implemented as soon as possible due to the Consolidated Appropriations Act, 2021 signed into law on December 27, 2020, which allocated up to two (2) billion dollars to provide financial assistance to individuals or households with COVID-19 related funeral expenses. 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 to revise OMB Collection 1660-0002 Disaster Assistance Registration to allow Call Center staff to use the current version of instrument 009-0-1T, Tele-Registration in the following modified manner:

- Call Center staff will provide clarifying statements to applicants regarding how the currently approved disaster assistance questions in the script relate to COVID-19 Funeral Assistance;

- The currently approved response fields in the registration script will be utilized to capture the following COVID-19 Funeral Assistance related data:
 - **Damaged Dwelling Address** field – Used to indicate the address where the deceased individual passed away,
 - **County/Parish/Municipio Where the Damage Occurred** field – Used to indicate the County/Parish/Municipio where the deceased individual passed away,
 - **Date When the Damage Occurred** field – Used to indicate when the COVID-19 funeral expenses were incurred,
 - **Medical/Dental/Funeral or Burial Insurance** field – Used to indicate any Funeral or Burial Insurance, and any assistance provided by another source (i.e. State, voluntary organization, etc.), and
 - **Name, Social Security Number (SSN), Date of Birth** fields in the **Occupants** section – Used to indicate the name, date of birth, and SSN for the Co-Applicant and of each Deceased Individual(s). and
- Applicants will be advised at the conclusion of the registration process that the following documents will need to be submitted for verification and prevention of duplication of benefits purposes:
 - a death certificate for the deceased individual indicating COVID-19 attributed to the cause of death,
 - documentation including receipts or a funeral contract indicating the cost of the funeral expenses incurred, the date funeral expenses were incurred, confirmation the funeral was for the deceased individual, and the name of the person who paid for the funeral, and
 - documentation from other sources including settlement amounts paid by funeral or burial insurance or any assistance provided by a state agency, voluntary agency, or other sources.
- The applicant will also be sent electronically or by mail a Request for Information (RFI) letter after registration outlining the requested documentation.

Mission Essential Information

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288) (the Stafford Act), as amended, is the legal basis for FEMA to provide disaster-related financial assistance and services to individuals who apply for disaster assistance benefits in the event of a federally-declared disaster. Regulations in title 44 of the Code of Federal Regulations (CFR), Subpart D, “Federal Assistance to Individuals and Households,” implement 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 damage, necessary expenses, and serious needs which are not covered through other means. The “Other Needs Assistance” (ONA) provision of FEMA’s 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.

Currently, when the President declares a Federal disaster or emergency, disaster survivors can register for assistance using one of the following instruments:

- **FEMA Form 009-0-1Int (English) or 009-0-2Int (Spanish)** – allows disaster survivors to apply for assistance by accessing the forms through www.Disaster.Assistance.gov via desktop or mobile devices.
- **FEMA Form 009-0-1T** – disaster survivors can call FEMA’s 1-800 number to speak with a FEMA Human Service Representative to apply for disaster assistance over the telephone.
- **FEMA Form 009-0-1 (English) and 009-0-2 (Spanish)** – is the paper version of the disaster assistance registration form. This is only used in rare circumstances when FEMA’s registration system is not accessible or when phone lines are down.

The information collected from one of the above instruments is electronically transferred to FEMA’s official system of record, the National Emergency Management Information System (NEMIS), so the data can be stored and processed.

Due to the passing of the Consolidated Appropriations Act, 2021 into law on December 27, 2020, which allocated up to two (2) billion dollars to provide financial assistance to individuals or households with COVID-19 related funeral expenses, FEMA requests an Emergency Waiver to utilize the current FEMA Form 009-0-1T, Tele-Registration script in a modified manner to gather necessary COVID-19 funeral related information to effectively provide assistance in a timely manner. This modified instrument will be referred to as 009-0-1T-COVID-FA.

According to the Center for Disease Control’s COVID Data Tracker, there have been approximately 344,497 COVID-19 related deaths in the United States as of December 31, 2020. FEMA estimates approximately 500,000 applicant registrations for COVID-19 Funeral Assistance as a result of the Consolidated Appropriations Act, 2021. FEMA’s IHP has determined that utilizing a modified version of the current FEMA Form 009-0-1T, Tele-Registration disaster assistance script is the best method to effectively accept and process these registrations.

Paperwork Reduction Act Timeframes

To meet the requirements of the Consolidated Appropriations Act, 2021, FEMA intends to begin accepting COVID-19 Funeral Assistance registrations in mid-March 2021. Adhering to the standard PRA timeframe would hinder the ability to swiftly begin providing assistance to individuals and households as directed under the Act.

Public Harm is reasonably likely to Result if Normal Clearance Procedures are followed

The effects of the COVID-19 pandemic have caused an extraordinary economic burden on U.S. individuals and households. Public harm in the form of unexpected financial burden related to funeral and burial expenses will continue to impact Americans without FEMA’s implementation of the modified method of collecting COVID-19 funeral related data. FEMA’s use of the information will ensure that individuals and households who have been burdened unexpectedly with COVID-19 funeral or burial expenses are provided with the financial assistance available to them. If FEMA were required to follow the normal clearance process, it would be impossible to collect the necessary information for assistance delivery in a timely and effective manner.

Unanticipated Events

The public health and economic effects of the COVID-19 pandemic continue to increase, and the full scope of the impact to Americans is not fully known at this time. FEMA must act immediately to provide necessary financial assistance to individuals and households in accordance with the Consolidated Appropriations Act, 2021.

Conclusion

Following the normal clearance procedures for OMB approval to collect information during the COVID-19 pandemic will delay FEMA’s ability to assist Americans by helping to alleviate financial burden as a result of unexpected funeral or burial costs. 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.

The Department of Homeland Security respectfully requests your approval of FEMA’s emergency revision to allow Call Center staff to use a current instrument in a modified manner.

Thank you for your consideration.

Approve

Date

Disapprove

Date